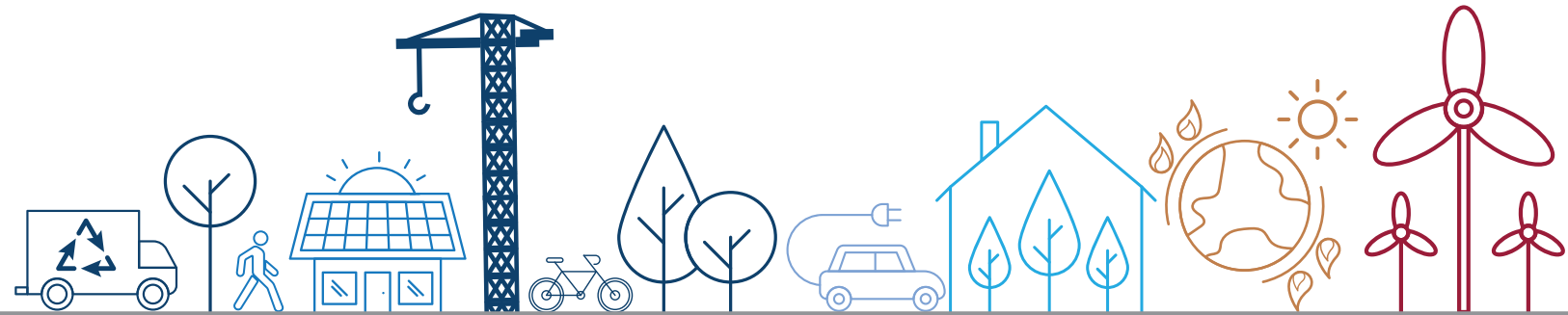


CLIMATE EMERGENCY PLANNING POLICY & GUIDANCE



CONSULTATION REPORT JULY 2022



Climate Emergency Planning Statement – Consultation Report



Plymouth and South West Devon Joint Local Plan

Consultation on the draft Climate Emergency Planning Policy and Guidance document took place for 7 weeks between 3 March 2022 and 19 April 2022. Over 1,800 comments were made by 128 individuals and organisations (see Appendix 1) and a range of views were expressed.

The consultation proposed a number of new mitigation and adaptation measures and asked specific questions on each one. There has largely been general support for the positive approach being taken and many feel it should go further, however, there has also been objection expressed by developers and housebuilders. The comments can generally be categorised as follows

- The public overwhelmingly supported the intentions of the document, expressing support for the measures and in many cases want to go further, offering various suggestions about other things to be included
- Interest groups and other organisations generally support the proposals although suggest going further and provide more detailed comments in relation to their specific areas of interest
- Developers were concerned about reference to it as new policy which is untested, does not have the same status as the JLP and can only be made through a review. They objected to measures placing further burdens on them, going further than building regulations and raised concerns on the impact on viability and delivery. Some raised the issue of adequate resourcing to deal with additional compliance work.

These comments have been taken into account in finalising the Climate Emergency Planning Statement. In response to comments made the document has been streamlined to set out clearly the status of the document and when it will be applied. Some of the comments related directly to the Strategic Objective and the Mitigation Measures, set out below is a summary of the comments and how the document has been amended.

A high level summary of the comments received by question is included at Appendix 2. A copy of all the consultation responses is available in full here ([insert a link](#)).

Strategic objective

What we proposed in consultation:

CES01 Strategic Objective

Delivering positive measures to address the climate emergency

To deliver development that mitigates the impacts of climate change and adapts to its current and future effects through:

- **Ensuring resilience by providing positive benefits that reduce carbon**
- **Incorporating renewable energy**
- **Increasing energy efficiency**
- **Using sustainable local materials and minimising embodied energy**
- **Moving away from natural gas and oil**

Climate Emergency Planning Statement – Consultation Report



Plymouth and South West Devon Joint Local Plan

- **Embracing electric vehicles and their charging infrastructure**
- **Increasing walking and cycling opportunities**
- **Reducing waste and increasing recycling**
- **Effective use of solar gain, solar cooling and shading**
- **Delivering biodiversity net gain and using nature based solutions**
- **Reducing flood risk, improving sustainable drainage and minimising impermeable surfaces**

Summary of considerations:

A number of comments suggested that retrofit and reuse of existing buildings should be included as an explicit objective of the document.

Statutory consultees suggested that flood risk in its various types already exist as a result of our current weather patterns, and these are only going to get worse, we are not going to be able to ‘reduce’ flood risk, but should instead be seeking to better ‘manage flood risk’.

The impacts of ongoing reliance on fossil fuels is not limited to space and water heating within buildings, but also from our existing patterns of movement using petrol and diesel vehicles.

Proposed amendments and justification:

The wording for some of the bullet points in the objective have been revised to provide clarity, including wording suggested in comments from the EA about managing flood risk

Reference to fossil fuels has been broadened to allow for consideration of fossil fuel impacts associated with all development.

Updated CESO1 to include more explicit intention to encourage retrofit and re-use of existing buildings

Updated CESO1 has been moved to section 4 of the CEPS document

Measure: M1 – Thermal Efficiency

What we proposed in consultation:

Fast-track a 27% thermal efficiency uplift for non-domestic dwellings ahead of building regulations

Asked if we should adopt a ‘performance gap’ policy

Summary of considerations:

The responses were split between many that suggested we go further now, and require all new development to reach passivhaus standard, and others that claimed any additional uplift would result in homes being unviable to build.

Climate Emergency Planning Statement – Consultation Report



Plymouth and South West Devon Joint Local Plan

In addition, at the time of drafting the original measure, it was unclear what would be happening to the Future Building Standards, and it was considered appropriate to include a thermal efficiency measure for non-domestic buildings that could be applied across the JLP area. However, in June 2022 the new Building Regulations Approved Documents were implemented, and that included a Part L 'volume 2' document that applies to non-domestic buildings.

The 2021 Part L Building Regulations requirements (implemented on 15 June 2022) also include a new reporting schedule for air tightness that will see all buildings tested for air tightness, rather than just a sample. This is a significant improvement, and will see developers accountable for ensuring that all buildings are constructed to the design specification.

Proposed amendments and justification:

Due to the 2021 Part L Building Regulations (implemented on 15 June 2022) introducing new thermal efficiency measures for non-domestic buildings, we will no longer be introducing a measure that seeks to achieve this, as to do so would simply be a repetition of Building Regulations.

Uplifts to 2021 Building Regulations (implemented on 15 June 2022) were the subject of government consultation and impact assessments, which show that the viability implications of these new measures are acceptable, and will not harm the deliverability of new development.

For the same reason, we will not be seeking to introduce a 'performance gap' policy at this time, as the new Building Regulations now require 100% of buildings undergo air tightness testing before they can be considered building regulations compliant.

M1 – Thermal Efficiency is no longer required due to uplifts in Building Regulations

Measure: M2 – Roof mounted solar PV

What we proposed in consultation:

For all residential development, we will apply the Future Homes Standard 2022 requirement of 40% of the building footplate to include solar pv panels integrated into the roof design.

For commercial and appropriate other development, we will require a minimum of 40% of the roof space to include solar pv panels integrated into the roof design.

Summary of considerations:

Considerable support was provided for ensuring that solar PV is delivered on new developments, and for extending the PV requirement to all buildings including non-domestic buildings.

Some responses suggested that there could be viability implications for developers if solar PV was a requirement on every new building.

Climate Emergency Planning Statement – Consultation Report



Plymouth and South West Devon Joint Local Plan

A handful of responses suggested that the visual impact of solar PV should restrict the installation of PV in certain locations, such as the South Devon AONB.

In addition, at the time of drafting the original measures, it was anticipated that the 2021 Part L Building Regulations changes would include a requirement for roof mounted PV. However, whilst there is a potential role for PV identified within the notional building in the 2021 building regulations, it is not an absolute requirement.

Proposed amendments and justification:

Having clarified that onsite energy generation was not a requirement of 2021 Part L, it is considered more effective to continue to apply existing adopted policy DEV32.4 which requires an equivalent 20% carbon saving to be delivered by onsite generation.

This is likely to be through roof mounted solar PV, however there may be circumstances where solar PV is not the preferable energy source, and as such we will be renaming this measure to 'Onsite renewable energy generation'.

This approach is compatible with measure 'M4' which promotes the use of heat pumps and other low carbon technology for space and water heating – in particular roof mounted PV and heat pumps work effectively in combination.

Any suggestion that low carbon technology is not appropriate in the AONB because of visual impact is too simplistic, and could potentially unfairly limit the ability of residents in the AONB from reducing their emissions and fuel bills. Discussions with AONB colleagues confirm that there is no presumption against either solar PV or heat pumps, although there will be more suitable products to be used in an AONB, such as matt finish PV panels that are built into a roof, rather than bolt on options.

M2 – Roof mounted Solar will go forward in the revised document as new measure **M1 - Onsite Renewable Energy Generation**.

Measure: M3 – Battery storage

What we proposed in consultation:

All development with solar pv should identify a suitable space to accommodate a battery.

Summary of considerations:

Support for this proposal, although many wanted to go further and introduce a requirement for battery storage because of benefits in reducing demand from the grid, and reducing energy bills for residents and businesses.

Some responses objected on the basis of additional cost for battery storage.

Proposed amendments and justification:

Climate Emergency Planning Statement – Consultation Report



Plymouth and South West Devon Joint Local Plan

No changes are proposed from the measure that was consulted upon. Future iterations of the policy may introduce a specific requirement for battery installation, although more research needs to be undertaken in terms of product delivery at scale, and viability considerations.

M3 - Battery Storage is now **M2 - Energy Storage**

Measure: M4 – Heat pumps

What we proposed in consultation:

All new buildings are required to be built with a heat pump (air source or ground source) to provide space and water heating. To facilitate this the three phase electricity supply should be fully enabled.

Summary of considerations:

The majority of comments in support of this measure recognised the harm of continuing to lock in dependence on fossil fuels, and saw heat pumps as a suitable alternative technology that can reduce emissions in the short term. In addition there were comments requesting more flexibility for alternative low carbon space and water heating, such as biofuel

Some concerns over the visual and amenity impact of heat pumps were based on assumptions that have now been largely designed out of modern heat pumps, which are not as noisy as early versions of the technology. Developers and designers have developed better levels of awareness in terms of locating heat pumps to not only maximise efficiency, but to also reduce the visual and amenity impact of the pumps.

Discussions with The Heat Pump Federation have provided a useful insight into the scale of production and the availability of installers and engineers to support the scaling up heat pump use. There is little evidence that the sector for both air and ground source heat pumps could not meet the modest additional demand created by the implementation of this measure.

Comments also suggested that there could be grid constraints that prevent the deployment of heat pumps at a strategic scale.

Proposed amendments and justification:

We are proposing to adopt the measure as consulted upon, but with some additional text to provide greater clarity, and to provide flexibility for other low and zero carbon technologies to be used for space and water heating.

It is recognised that heat pumps may not be the only heating system that can deliver low carbon space and water heating to buildings, and as such we will be renaming this measure reflect this.

We have worked in close consultation with Western Power Distribution to ensure that domestic supply will not be a barrier to low and zero carbon technology. WPD have a [corporate](#)

Climate Emergency Planning Statement – Consultation Report



Plymouth and South West Devon Joint Local Plan

[commitment to ensuring that three-phase supply](#) is delivered to new buildings as standard, and it is up to developers to ensure that all three phases are enabled within the building by using the appropriate circuit board and wiring internally.

M4 - Heat Pumps will go forward in the revised document as **M3 - Low and zero carbon space and water heating systems**

Measure: M5 – Passive solar heating and reducing the risk of overheating

What we proposed in consultation:

Where the window to floor area ratio exceeds 21% on any elevation, we will require specific protective measures such as:

Tinted glass

Extended overhanging eaves to create shade when the sun is at its highest point

External shutters or Brise Soleil

Summary of considerations:

Some responses question if the 21% threshold was a little simplistic, given each aspect of a building has a different relationship with the sun?

Some responses questioned if the LPAs had the resources for DM case officers to cross-reference ratios for every room in every building?

Additional considerations: new Building Regulations Approved Document Part O – Overheating, was brought into operation on 15 June 2022 and contains some specific thresholds for developers to meet in terms of glazing and orientation.

Proposed amendments and justification:

With the introduction of Building Regulations Approved Document Part O there is a clearer framework of compliance for developers to meet, and this somewhat supersedes the 21% that was consulted upon.

In discussion with building control colleagues, it is considered necessary to include a passive solar design measure as a planning measure. During consideration of a planning application the local planning authority has the ability to work proactively with applicants to request revisions to building design before a planning permission is granted. This flexibility is not inherent in the building control function, and if, once a building is being inspected, it is found to be non-compliant, the design will need to come back through the planning system to gain permission for a different design.

Building control colleagues have recommended that applicants provide a completed copy of the Part O compliance checklist as part of a planning application, so that officers can consider if any aspects of the design need to be changed to enable future compliance against Part O.

Climate Emergency Planning Statement – Consultation Report



Plymouth and South West Devon Joint Local Plan

In planning for appropriate and effective passive solar gain, developments will also reduce the risk of overheating, and as such this adaptation measure will be renamed as 'Passive solar design', which is a more accurate reflection of what we are seeking to achieve.

M5 - Passive solar heating and reducing the risk of overheating will go forward into the revised document but as an adaptation requirement as **A1 - Passive Solar Design**

Measure: M6 – Locally sourced materials

What we proposed in consultation:

We are therefore introducing a hierarchy of acceptability for natural roof slates:

- **Reclaimed UK or European slates where available with proof of origin from supplier**
- **New UK derived slates with proof of origin from supplier**
- **New European derived slates with proof of origin from supplier**
- **No other natural slate products will be considered acceptable**

Summary of considerations:

The majority of supportive comments requested that we include natural stone within the requirements of this measure, using a similar hierarchy of acceptance.

Clarification was requested for the circumstances whereby this measure would be applied. An unintentional by-product of this measure would be if developers who would normally have used natural slate from Brazil or China opt for manmade tiles instead.

There was general support for requiring a minimum warranty period also, to ensure that full life cycle impacts of selecting cheaper slates could be avoided.

Concern was raised over the additional cost of using natural materials from the UK and Europe, rather than further afield.

Proposed amendments and justification:

Whilst viability considerations need to be reflected in these measures, an urgent response to the climate emergency will require decisions to be informed by carbon emissions and environmental impact as well as economic reasons. The true 'cost' of a product requires consideration of more than simply the price paid.

It is important that the price paid for land to develop fully reflects the full costs of climate resilient development, and this is recognised by housebuilders in their annual reports. The local planning authorities are being clear and explicit about the standard of development that will be supported, so that the financial viability of these requirements can be understood by developers prior to securing options on, or buying land.

Sufficient support was provided to extend this requirement to natural stone also, and the same hierarchy of acceptance will be applied to natural stone, where it is required.

Climate Emergency Planning Statement – Consultation Report



Plymouth and South West Devon Joint Local Plan

A minimum warranty period of 50 years is introduced for new slates and stone to limit the life-cycle impacts of using less resilient materials.

M6 – Locally sourced materials will go forward into the revised document as **M4 – Resilient and low carbon building materials**

Measure: M7 – Principle of net gain

What we proposed in consultation:

Proposals for extensions should deliver a measurable net gain in energy performance across the whole building.

Any buildings that have not yet achieved a minimum EPC band C will be required to achieve a minimum one band uplift as part of the process to extend an existing dwelling or building.

Summary of considerations:

This was a well-supported measure in principle, not least because it is well understood that the majority of UK emissions attributed to buildings come from existing structures that would benefit from retrofit measures, although the use of Energy Performance Certificate (EPC) as a measure attracted less support.

Additional considerations: 2021 Part L Building Regulations introduces new and specific measures for extensions which significantly improve the operational efficiency of the new structures. In some instances, consequential improvements are required to the existing building as part of the improvements, including where glazing and door openings are increased beyond a certain threshold, or if a building with a specified threshold is extended.

In discussion with SAP assessors, it does appear that the limitations of the process to create an EPC could make it difficult to achieve this measure without requiring significant investment in new wall and roof insulation.

Current software that generates EPC is likely to generate an automatic one band uplift simply by installing a new, more efficient, gas boiler in many existing homes. Since this document includes a measure that seeks to limit the deployment of new fossil fuels reliant boilers, this measure could have significant unintended consequences, which act against the intention to phase out gas boilers.

Proposed amendments and justification:

Propose to remove this requirement due to the flaws in the EPC software that would lead to potentially unsuitable outcomes – such as the installation of new gas boilers which currently result in a single band EPC uplift.

In addition, the limitations of the software are likely to require significant additional investment into existing buildings before a one band uplift can be achieved for the worst performing buildings. Without grants or funding available to assist with the retrofit of poorly performing

Climate Emergency Planning Statement – Consultation Report



Plymouth and South West Devon Joint Local Plan

buildings the implementation of this requirement is likely to result in unequal outcomes and inconsistent benefits.

M7 Principle of net gain will not be included in the revised document due to the likelihood of unintended consequences and limitations in the EPC process

Measure: M8 – Demolitions and replacement buildings

What we proposed in consultation:

If an existing building is proposed to be demolished as part of a planning application, the developer will need to calculate and offset all the embodied energy within the structure, to be demolished (minus carbon saved through reuse and recycle) together with the embodied carbon of the new build. This is the net overall carbon cost of the new building and should be offset within 25 years of onsite operational use of the replacement building.

The target emissions rate (T) from the SAP is multiplied by the floor area to provide a baseline annual energy demand. The dwelling emissions rate (D) will provide an estimate of actual energy demand. The difference between the target emissions rate and the actual dwellings emission rate over the 25 years should be equal or more than the net amount of embodied carbon in the original structure.

$((T \times \text{floorspace}) \times 25) - ((D \times \text{floorspace}) \times 25) = \text{more than or equal to the net embodied carbon of original and new structure.}$

Summary of considerations:

Widespread support in principle for trying to reduce the loss of embodied carbon through demolition and rebuild proposals. Some misunderstanding of the use of the word 'offset' in terms of how carbon impacts of the overall project are going to be used.

Support for the creation of a mechanism to calculate an offset calculation, although there was a range of views regarding an appropriate offsetting period to be achieved through operational energy savings, with a large number of responses favouring a 10-year period within which the carbon cost of a project needs to be achieved through operational savings.

Additional considerations: Approved Building Regulations Document Part L uses a notional 'payback period' when considering proportional return on investment, which is set at 15 years.

A number of users suggested the Green Building Calculator, although this is another paid for online platform.

Proposed amendments and justification:

The requirement is proposed to remain largely unchanged, albeit some wording has been changed to improve clarity. Testing against 2013 territorial Emissions Rate (TER) has suggested that 25 years is a reasonable 'offset' period, and that it is effective in encouraging reuse of materials, and promoting a very high standard of operational efficiency in the replacement dwelling.

Climate Emergency Planning Statement – Consultation Report



Plymouth and South West Devon Joint Local Plan

Further work is required to continue testing against TER generated using 2021 Building Regulations Part L, and we are engaging with external partners and building regulations colleagues to assist with this testing process.

Suggestions to consider a 10 year 'offset' period is considered too onerous when considered against a 2021 Part L TER baseline. Similarly, a 50 year 'offset' period is considered to lack ambition or set a high enough threshold to deliver meaningful reductions in carbon.

An article 4 direction is being considered to bring demolition within planning control, and this is in the process of detailed scoping.

M8 – Demolitions and replacement buildings will go forward into the revised document as **M5 – Demolition and rebuild**

Measure: M9 – EV charging points

What we proposed in consultation:

All new charging points serving domestic dwellings need to have a minimum installed capacity of 7kw.

All new communal parking areas must have 50% of bays connected with 7kw charging points at the time of completion, and the remaining 50% must be serviced with appropriate infrastructure to enable installation of charging points later.

For new commercial development the charging points must have a minimum installed charging capacity of 22kw.

Summary of considerations:

There was broad support for EV charging aspirations as part of domestic development, in particular that 7kw is an appropriate charging capacity. There was less consensus on how to ensure charging points in public places and commercial parking areas met the demands of users.

Additional considerations: 2021 Building Regulations Approved Document Part S (implemented 15 June 2022) introduced new requirements for domestic and non-domestic development, in terms of the number of charging points and wiring per parking space. The Regulations only prescribe a minimum 7kw charging standard for all spaces, and do not differentiate between domestic and non-domestic development.

Proposed amendments and justification:

No new quantitative requirements for EV charging points will be introduced beyond Part S building regulations. Instead, we will be introducing minimum charging capacities for specific non-domestic development.

Using the quantitative requirements from Building Regulations Part S, development within Use Class Order B will need to install minimum 11kw chargers, and Class E uses will need to install a minimum of 22kw chargers.

Climate Emergency Planning Statement – Consultation Report



Plymouth and South West Devon Joint Local Plan

M9 – EV charging points will go forward into the revised document as **M6 – Electric Vehicle Charging Points**

Measure: M10 – Active and sustainable travel

What we proposed in consultation:

For major development an additional policy expectation will be to require an external charging point within or adjacent to the cycle storage area to provide support for cyclists who wish to use ebikes. All cycle storage and charging points will need to be clearly marked on site and floor plans.

In addition, residential developments of over 50 dwellings will need to include an assessment of onsite car club and ebike hire potential, as well as opportunities to contribute to existing active and sustainable travel projects within the local area. In Plymouth, an assessment of how the proposal can link with existing and planned mobility hubs will be required.

Summary of considerations:

General support was given for the aim to increase modal shift towards active and sustainable travel.

The challenges of achieving modal shift away from the car in rural areas was recognised, and so too was the damaging effects of putting new development in locations that relied upon the car. A lot of support for more buses and trains, and cheaper fares to incentivise sustainable travel, but this is beyond the scope of what this document, and planning in general, can facilitate.

Although there was cautious optimism about how EVs could reduce emissions in rural areas, it was also acknowledged that it may be many years before these benefits are fully seen in rural communities due to the cost of EVs and the limitations in charging infrastructure.

Proposed amendments and justification:

We have clarified what is required by each type of development, and highlighted the relevant parts of the JLP and SPD that should be referenced in an application.

We are amalgamating 'M11 – reducing reliance on the private car' into the sustainable and active travel measure, in order to maintain a positive and proactive approach to meeting the challenges of the climate emergency.

We have broadened one of the aims of the overall strategic objective to 'reduce reliance on fossil fuels' as this is just as relevant to personal travel as it is for heating systems and boilers.

Climate Emergency Planning Statement – Consultation Report



Plymouth and South West Devon Joint Local Plan

M10 – Active and Sustainable Travel goes forward into the revised document as **M7 – Active and Sustainable Travel**

Measure: M11 – Reducing reliance on the car

What we proposed in consultation:

Any development proposal that locks-in reliance upon the private car, and exclusively caters for car borne customers, such as drive through restaurants, cannot be considered to meet the most basic requirements of the JLP or NPPF, and does not represent a people or place based pattern of development and should be refused.

Summary of considerations:

There was broad support for the intention to reduce development that was reliant upon access by the car, although no clear consensus about the best way to achieve this.

A small number of representations suggested that both the NPPF and JLP already have policies that allow the LPAs to consider whether development would increase reliance upon the car alongside other planning considerations. It was also suggested that the working of this measure was inconsistent with the rest of the document as it was negatively phrased, and that such an approach is not generally accepted when drafting planning policy.

Proposed amendments and justification:

Although the LPAs are clear that the new measures are not planning policies in themselves, they are intended to be used to inform planning decisions, and as such, the negative wording does need to be considered.

One of the stated aims of this piece of work is to reduce reliance upon fossil fuels, both within new buildings and by reducing the wider spatial impacts of developing in locations that lock-in reliance upon the car. However, it is accepted that this could be done in a more positive and proactive manner, and as such we will focus upon the promotion of sustainable and active travel as the means to reduce fossil fuel dependent private transport.

We have broadened one of the aims of the overall strategic objective to ‘reduce reliance on fossil fuels’ as this is just as relevant to personal travel as it is for heating systems and boilers.

M11 – Reducing reliance on the car will not feature in the revised document, although elements of this measure are included within **M7 - Active and Sustainable Travel**, and also within **CES01 - Strategic Objective**

Climate Emergency Planning Statement – Consultation Report



Plymouth and South West Devon Joint Local Plan

Adaptation

What we proposed in the consultation:

Greater emphasis on adaptation measures that are already robustly dealt with in the JLP and SPD, bringing them together and using a green space factor tool as an effective mechanism for addressing adaptation comprehensively.

Summary of considerations:

General support for adaptation measures, and a mixed response to the local green space factor. Some misunderstanding of what is already being applied and what is suggested, as 10% Biodiversity net gain and use of Biodiversity metric is already included in the policy and SPD.

Some support for new measures such as grey water use, water butts and net gain of trees.

Proposed amendments

There is considerable value in bringing together all the adaption policies and requirements into a single place. They are currently scattered throughout the JLP and SPD and identifying them collectively enables their contribution to be considered holistically. The climate emergency has afforded the multifunctional adaptation benefits more importance given their role in capturing carbon and providing more resilience to extreme weather events. The Climate Emergency Compliance Form will be used for all development to demonstrate exactly how these issues are addressed recognising their important role in addressing the climate emergency.

The green space factor is an effective tool for securing multifunctional adaptation benefits within developments. A Green Space Factor Tool will be developed separately and introduced with additional Biodiversity Net Gain and habitat banking guidance.

Climate Emergency Planning Statement – Consultation Report



Plymouth and South West Devon Joint Local Plan

Appendix 1: List of organisations

- Ash Futures
- Baker Estates
- C G Fry & Son Ltd
- Green Environment Topic Group, Dartmouth Neighbourhood Plan Steering Committee
- Climate Action Plymouth and Environment Plymouth
- Co Cars Ltd
- Cornwall Council
- Dartington Neighbourhood Plan Steering Group
- David Sheppard Architects
- Devon County Council
- Emery Planning
- Environment Agency
- Environment Plymouth
- Food Plymouth
- Forestry Commission
- Gladman
- Historic England
- Holbeton Parish Council.
- Kingsbridge Climate Action (KCA)
- Kingsbridge Town Council
- LiveWest Homes Limited
- MABRAKE
- Ministry of Defence
- National Farmers Union (NFU)
- Natural England
- Nudge Community Builders
- Okehampton Hamlets Parish Council
- Pennon Group and Stuart Partners Ltd
- Persimmon Homes
- Plymouth Citybus Ltd
- Public Health Devon
- Rattery Environment Group
- Rattery Parish Council.
- Sherford New Community Consortium
- Sourton Parish Council
- South Hams Climate Action Network Chair
- South Hams Tree Wardens Network
- Southwest EV Owners Group
- Stephen Guard Architects

Climate Emergency Planning Statement – Consultation Report



Plymouth and South West Devon Joint Local Plan

- Strategic Development Projects, Plymouth City Council
- Sustainable South Brent
- Tavistock Town Council
- The Coal Authority
- Totnes Town Council
- Transition Tavistock
- University Hospitals Plymouth NHS Trust, Future Hospital Programme Manager
- Vistry Group
- Wainhomes (South West) Ltd

Climate Emergency Planning Statement – Consultation Report



Plymouth and South West Devon Joint Local Plan

Appendix 2: Summary and scale of issues raised

Climate Emergency Planning Statement – Consultation Report

Question/Section Numbers	Question/Section Text	Summary of Key Issues
Section 1	Introduction	High view of the proposals, most are in favour of the proposals. Some concern over where energy will come from for heat pumps and EV
Section 2	Consultation	Welcomed/ some concern on delay to get specific climate policy, suggests building materials are a major factor, need to be fighting climate change and some concern over implementation of the guidance.
Section 3	Status of the policy and guidance	Reality needs to match theory, needs to be reviewable as new events/data comes to light.
Section 4	Why additional policy and guidance is needed	Some welcome, some question climate emergency, some question could we do more. Devon ask that the Climate emergency partnership be mentioned in Para 4.2.
Section 5	Recent national policy and guidance	Happy content references SDG, could go further asks if BNG will be monitored. Para 5.10 could include a transport document such as Decarbonising Transport.
Section 6	Recent appeal decisions	Comments on what appeals should do in new housing, reference appeal decisions should mitigate against climate change.
Section 7	Stakeholder and developer climate statements	Developers should be accountable, statements should be able to be measured.
Section 8	How the policy and guidance relates to the Joint Local Plan	Could mention policy in this chapter to make it easier for developers to understand the content.
Section 9	How the policy and guidance relates to the Plymouth and South West Devon Joint Local Plan Supplementary Planning Document	Support proposals, need a simple web based tool.
Section 10	What the policy and guidance does and how it works	Some requests that definitions are earlier in the document, 27% be implemented now and increased to 80% in 3 years' time, could be strengthened. Minor tweaks to wording.
Section 11	Mitigation	Many Comments. Dwellings could be orientated to the south, can document be flexible to cover issues such as a move away from air pumps, AONB should have some exemptions for heat pump, consider bike storage, local timber as house building materials, retrofit should be an objective of guidance, could specify a passivhaus standard rather than bolt on solutions, suggest alternative rating for embodied carbon of materials, reconsider EPC rating. Could consult with BRE.
Section 12	Adaptation	Include greenspace for biodiversity reasons, need local green washing, increase tree cover, increase tree protection, new developments could provide a 10% net gain, also harvest grey water, blue space could be considered, could develop a tool to measure benefits of green space.
Section 13	Structure of the Document	Green walls and roofs will need water to maintain, BNG > 10% ecology surveys for all developments. Tiered council tax depending on green rating.
Section 14	How will we deliver this?	Heating, lighting could be a greater priority than offsetting, need to be clear on how adaptation measures are secured for the lifetime of the development. More education to public on ecology.



Plymouth and South West Devon Joint Local Plan

Climate Emergency Planning Statement – Consultation Report

Section 15	Sustainability and Equalities Impact Assessment	Liaise with health authorities/emergency services to respond to climate emergencies, could expand para 15.1 to include the benefits of the guidance. Para 15.2 could include children, elderly and low income groups. Para 15.4 include the reduction of flood risk to existing development as a result of contributions to flood risk management schemes.
Section 16	What do you think?	Some agreement. Suggestions are planning applications should require developer to mitigate impact of proposals, pv should be on all new builds, consider AONB impacts as aesthetics of proposals are not seen as positive and harvest grey water.
Section 17	17 Appendices: Mitigation and adaptation factsheets	Could include home grown timber to M6 list.
Section 18	Appendix 1: Mitigation - Extensions, conversions and change of use	General tweaks suggested including M6 para 18.10 consider alternative sources, 18.24 needs to be clear if any application triggers EV ports requirement, 18.22 could require a robust statement should a building be intended to be demolished. M8 sensitivity for listed buildings consider article 4 use. M9, M10, M11 need to be future proof for new technology. M10 some concerns of identification of infrastructure improvements needed, could have an assessment of links for more rural locations, 19.52 'back bus better' suggested.
Section 19	Appendix 2: Mitigation - New build (housing, commercial, other	General tweaks suggested including consider electricity generated rather than roof coverage, para 19.35 encouragement should be greater, para 19.40 text suggested, concern M9/10 are not inclusive to rural areas, M2 concerned listed assets and impacts of solar on roof if not appropriate.
Section 20	Appendix 3: Adaptation - All development	General tweaks suggested including protection of existing trees should be greater, Para 20.2 reference broader landscape and heritage value, para 20.23 suggests using biodiversity metric, para 20.09 clearer wording, further guidance for para 20.14, A3 more clarity on if gardens are included as important green spaces, reference to A4 including enforcement measures, could build on DEV35 flood strategy. A5 Clear set out for managing and protecting proposals. Reference heritage or historic environment in line with NPPF Para 190.
Section 21	Appendix 4: Glossary	Could have been earlier.

Question Number	Question Text	Which Measure/area of document?	Number of responses	Summary of Key Issues
1	Will these new requirements work?	Whole Document	50	Cautious yes, needs monitoring and enforcement.
2	Do they go far enough or too far?	Whole Document	36	Mixed but mostly no
3	What are the challenges?	Whole Document	34	Complexity, keeping engagement, legal challenges, possible to measure, costs and enforcing.



Plymouth and South West Devon Joint Local Plan

Climate Emergency Planning Statement – Consultation Report

4	Have we missed anything?	Whole Document	34	Sustainable bus transport, guidance to avoid light pollution from large windows, district heating systems, plastic grass should not be allowed, rainwater harvesting, enforcement measures, grey water.
5	Could we do it better/differently?	Whole Document	21	Consider higher standards of airtightness and HVHR, consolidate energy efficiency/carbon reduction toolkits/checklists, link to JLP and show what grants are available.
6	What transitional arrangements are required?	Whole Document	22	Generally no from members of the public, resistance from developers.
7	Would any additional guides help?	Whole Document	23	Guide to explain terms (comments that terms should be explained outside of glossary), guide for listed building users, specimen application forms, compliance statement and easy presentation of guidance.
8	Should the Statement of Compliance be included as a new validation requirement and included on the local planning authorities Local Validation Lists?	Whole Document	30	Generally no from members of the public, resistance from developers. Suggestion that DAS could be used.
M1 Thermal Efficiency				
33	Should we fast track this Future Building Standard requirement of 27% now?	M1 (Mitigation – New build Housing commercial, other)	28	Yes from members of the public and no from developers. Public would like a greater level and developers concerned it is adding uncertainty to costs.
34	We know there is often a gap between what is designed and what is built, should we also introduce a mechanism to measure the performance gap of all types of development?	M1 (Mitigation – New build Housing commercial, other)	20	Generally yes. Enforcement and implementation is important, there should be independent assessments.
35	Should air tightness testing be required to ensure that thermal efficiency standards are met?	M1 (Mitigation – New build Housing commercial, other)	18	Generally yes from members of the public. Developer notes that it only shows if thermal standards have been met and that fabric performance is important, suggests Veritherm thermal assessments.
M2 Roof Mounted Solar PV				
36	Do you agree that a general minimum 40% requirement should apply to commercial buildings?	M2 (Mitigation – New build Housing commercial, other)	27	Generally yes,



Plymouth and South West Devon Joint Local Plan

Climate Emergency Planning Statement – Consultation Report

37	What measure should be used for this requirement – 40% of building footplate or 40% of roof space?	M2 (Mitigation – New build Housing commercial, other)	23	Mix of answers some state whichever is greater.
38	Should there be different standards for different types of uses?	M2 (Mitigation – New build Housing commercial, other)	22	Generally no, some concerns that a change of use could take place bypassing the requirements. Developer notes that PV fitted should depend on demand from on the type of property.
39	Should non-residential buildings with flat or mono-pitched roofs be required to include a pv system that is more than 40% of the building footprint or roof space?	M2 (Mitigation – New build Housing commercial, other)	21	Generally yes,
40	Should this requirement also apply to extensions with favourable aspect?	M2 (Mitigation – New build Housing commercial, other)	24	Generally yes, some concern that it could price out families
41	Should this requirement also apply to extensions on listed buildings and heritage assets?	M2 (Mitigation – New build Housing commercial, other)	14	Some yes and some case by case
42	Should we require solar pv panels integrated into the roof design or roof mounted panels?	M2 (Mitigation – New build Housing commercial, other)	19	Mix of comments some are prioritising efficiency or aesthetics. Generally efficiency is more popular.
M3 Energy Storage				
43	Does this go far enough? Should we be requiring all new buildings with onsite energy generation to include a battery storage system?	M3 (Mitigation – New build Housing commercial, other)	28	Interest in providing battery storage or space, developers wary of additional cost resulting and consider the battery market immature.
M4 Heat pumps				
44	Should we restrict all new gas and oil connections?	M4 (Mitigation – New build Housing commercial, other)	32	Generally yes, some concern this should be in line with national targets.
45	Do you foresee any difficulties in delivering this?	M4 (Mitigation – New build Housing commercial, other)	15	Availability of technology, cost and needs strong political leadership.
46	Should we be prioritising ground source heat pumps over air source heat pumps on developments at a	M4 (Mitigation – New build Housing commercial, other)	17	Generally yes. Developers would like to see decisions made based on viability, concern cost is higher but it is recognised they need less energy.



Climate Emergency Planning Statement – Consultation Report

	certain scale with favourable conditions, and if so, what should that threshold be?			
47	If there is an additional cost required by WPD to upgrade the local grid, how much is considered 'reasonable'?	M4 (Mitigation – New build Housing commercial, other)	12	Mixed comments. Ofgem has consulted and results are not yet out, price should be capped at £3000. Private power companies should not be receiving additional funding which could affect the viability of schemes
M5 Passive solar heating and reducing the risk of overheating				
9	Do you agree that passive solar gain already adequately covered by guidance in the SPD? If not what else is required?	M5 (Mitigation - Extensions, conversions and change of use)	15	Question not answered yes/no. Comments are consider trees and water to act as cooling and consider possible damp issues.
10	Are there other specific measures that we should include to reduce the risk of overheating?	M5 (Mitigation - Extensions, conversions and change of use)	16	Assessments should be consistent with industry standards, encourage tree planting for shade, solar glass, shading for high glass areas built into design
48	Do you agree that passive solar gain already adequately covered by guidance in the SPD? If not what else is required?	M5 (Mitigation – New build Housing commercial, other)	12	Some suggestions. Many councils across the UK have specified the Passivhaus standard which can be applied to all building types Need to be much firmer on solar orientation.
49	Are there other specific measures that we should include to reduce the risk of overheating?	M5 (Mitigation – New build Housing commercial, other)	12	An overheating assessment using CIBSE TM59 assessment criteria should be undertaken for overheating properties. Include water and shade trees for a cooling factor
M6 Locally sourced materials				
11	Do you agree we should ensure the use of more environmentally friendly, low carbon materials in all development?	M6 (Mitigation - Extensions, conversions and change of use)	35	Generally yes, some developer resistance. Could be clearer on what the more environmentally friendly are and a definition. It could also be subject to cost.
12	Are there more effective ways of doing this?	M6 (Mitigation - Extensions, conversions and change of use)	14	Specify materials and proof of compliance carbon quotas suggested, could consider longevity of products ie slates that last 60 years vs 80.
13	Should we extend this requirement to other natural products such as	M6 (Mitigation - Extensions,	21	Generally yes from members of the public, resistance from developers. Subject to costs.



Plymouth and South West Devon Joint Local Plan

Climate Emergency Planning Statement – Consultation Report

	stone where these are required within a development?	conversions and change of use)		
14	Should we require a minimum warranty period as well as proof of origin?	M6 (Mitigation - Extensions, conversions and change of use)	21	Generally yes. Subject to costs. Warranty and proof of origin should be included.
15	What evidence, if any, should we require of compliance?	M6 (Mitigation - Extensions, conversions and change of use)	18	Mix of responses including clear evidence that is reviewed, bill of sale showing origin and life expectancy.
50	Do you agree we should ensure the use of more environmentally friendly, low carbon materials in all development?	M6 (Mitigation – New build Housing commercial, other)	21	Generally yes.
51	Are there more effective ways of doing this?	M6 (Mitigation – New build Housing commercial, other)	7	Consider durability and safety, encourage recycled goods to be used.
52	Should we extend this requirement to other natural products such as stone where these are required within a development?	M6 (Mitigation – New build Housing commercial, other)	14	Generally yes
53	Should we require a minimum warranty period as well as proof of origin?	M6 (Mitigation – New build Housing commercial, other)	12	Generally yes, could also not allow anything with less than 30 years to be on a compliance list. Could be moving towards an embodied carbon assessment.
54	What evidence, if any, should we require of compliance?	M6 (Mitigation – New build Housing commercial, other)	11	Assessment of compliance could be a paid-for service provided by the Planning Authority, or a 3rd party provider. Much as building regs compliance is already done. Evidence of compliance should be required.
M7 Principle of net gain				
16	Do you agree we should seek to achieve a net gain in energy efficiency from extensions, conversions and changes of use?	M7 (Mitigation - Extensions, conversions and change of use)	32	Most responses are yes, some concern over costs and EPC not recognising heat pumps.



Plymouth and South West Devon Joint Local Plan

Climate Emergency Planning Statement – Consultation Report

17	Is the EPC the right measure of net gain?	M7 (Mitigation - Extensions, conversions and change of use)	22	Mix of responses between EPC and SAP. Comments however that EPC is most accessible.
18	What other measures can we use to demonstrate net gain?	M7 (Mitigation - Extensions, conversions and change of use)	13	Use improvement in SAP score and Increase U value of building and carbon reduction measurements.
19	Should there be exceptions to this approach?	M7 (Mitigation - Extensions, conversions and change of use)	15	Mixed responses. Listed buildings, extensions as they could be too difficult to measure
20	How do we ensure that net gain is also achieved on listed buildings and heritage assets?	M7 (Mitigation - Extensions, conversions and change of use)	19	Answers around tasking conservation officers to provide ways of improving efficiency in listed buildings. Case by case basis. Consider insulation and heating that is compatible with listed buildings.
21	Should the planning application specify the measures that will generate the uplift?	M7 (Mitigation - Extensions, conversions and change of use)	19	Generally yes from members of the public, resistance from developers.
M8 Demolition and replacement buildings				
22	Do you think we should prioritise reuse and retrofit of existing buildings	M8 (Mitigation - Extensions, conversions and change of use)	34	Yes from members of public, comment that it may not be best solution, viability, substandard building type, ineffective layout and low density referenced. One comment should be not for extensions and small developments.
23	Do you agree we should try and offset any loss of embodied carbon?	M8 (Mitigation - Extensions, conversions and change of use)	28	Generally yes, some comments that reuse should be first option. Should be avoided but if replacement was to result in lower emissions over 10 years it could be considered.
24	Is there a better approach? Should we consider an article 4 direction requiring prior approval?	M8 (Mitigation - Extensions, conversions and change of use)	11	Yes from members of the public. Although some caution and one comment notes that any article 4 should be more locally specific.
25	If we are going to offset embodied carbon is 25 years the right offset	M8 (Mitigation - Extensions,	13	Mix of comments some say 25, some 10, some up to 50 years. Consensus seems to be less than 25 years.



Plymouth and South West Devon Joint Local Plan

Climate Emergency Planning Statement – Consultation Report

	period? If not, what alternative should be used?	conversions and change of use)		
26	There is a variety of life carbon assessment tools available to calculate embodied carbon. Do you recommend any particular one?	M8 (Mitigation - Extensions, conversions and change of use)	9	Green building calculator
27	Should the LPAs offer access to a carbon calculator software package to enable developers to calculate the embodied carbon within a proposal? Would you use this?	M8 (Mitigation - Extensions, conversions and change of use)	15	Comments are generally yes. Developers should use same software package. To avoid low cost cheap packages that may not be accurate.
28	Should we require airtightness tests in addition to as built SAP assessment to demonstrate compliance?	M8 (Mitigation - Extensions, conversions and change of use)	21	Generally yes, also consider radon and appropriate ventilation. Concern about cost.
55	Do you think we should prioritise reuse and retrofit of existing buildings	M8 (Mitigation – New build Housing commercial, other)	15	Generally yes. A developer notes this may not be the best solution and mentions an ineffective layout of the existing scheme causing occupational issues.
56	Do you agree we should try and offset any loss of embodied carbon?	M8 (Mitigation – New build Housing commercial, other)	11	Yes
57	Is there a better approach? Should we consider an article 4 direction requiring prior approval?	M8 (Mitigation – New build Housing commercial, other)	7	Generally yes, concern loopholes will be used otherwise.
58	If we are going to offset embodied carbon is 25 years the right offset period? If not, what alternative should be used?	M8 (Mitigation – New build Housing commercial, other)	9	Not directly answered, should use ground source heat pumps. Developer questions how 25 years has been reached. Another comment says 15 years is better.
59	There is a variety of life carbon assessment tools available to calculate embodied carbon. Do you recommend any particular one?	M8 (Mitigation – New build Housing commercial, other)	6	https://greenbuildingcalculator.uk/ Suggested in line with Devon Carbon Plan
60	Should the LPAs offer access to a carbon calculator software package to enable developers to calculate	M8 (Mitigation – New build Housing commercial, other)	6	Yes



Plymouth and South West Devon Joint Local Plan

Climate Emergency Planning Statement – Consultation Report

	the embodied carbon within a proposal? Would you use this?			
61	Should we require airtightness tests in addition to as built SAP assessment to demonstrate compliance?	M8 (Mitigation – New build Housing commercial, other)	6	Yes, thermal assessments, such as Veritherm should also be proposed. Some unsure.
M9 EV charging points				
29	Should we be requiring a higher charging capacity in communal parking areas?	M9 (Mitigation - Extensions, conversions and change of use)	26	Yes from members of the public and no from developers.
30	Should commercial chargers be higher than 22kw?	M9 (Mitigation - Extensions, conversions and change of use)	13	Yes from members of the public and no from developers. Developer notes 11KW is equally effective if the installation has a load management system, public note 50Kw for future proofing.
31	Should we apply a threshold at which commercial development is required to install 22kw?	M9 (Mitigation - Extensions, conversions and change of use)	12	Mostly yes, some comments that vehicles at commercial sites will be doing more journeys require at least a moderate charge rate.
32	Should we be increasing the requirement to 50kw chargers for parking areas that serve class E businesses?	M9 (Mitigation - Extensions, conversions and change of use)	11	Comments are generally yes, some note remote rural locations are an issue, need to be future proof, depends on where the cost to increase chargers comes from ie owners vs energy companies.
62	Should we be requiring a higher charging capacity in communal parking areas?	M9 (Mitigation – New build Housing commercial, other)	12	Some yes, 7Kw suggested several times. 50% parking back requirement seems high. Could use active ev charging bays, should be considered as part of an active travel strategy.
63	Should commercial chargers be higher than 22kw?	M9 (Mitigation – New build Housing commercial, other)	8	Generally yes. 50kw suggested several times. Though a developer notes an 11kw communal charger is equally effective if the installation has a load management system.
64	Should we apply a threshold at which commercial development is required to install 22kw?	M9 (Mitigation – New build Housing commercial, other)	9	Mainly yes. It is noted that vehicles charged at commercial sites are more likely to do miles hence should have a high charge rate. In line with Devon Carbon Plan.
65	Should we be increasing the requirement to 50kw chargers for	M9 (Mitigation – New build Housing commercial, other)	6	Mostly yes, some resistance is it is a broad measure that may not work in villages,

Climate Emergency Planning Statement – Consultation Report

	parking areas that serve class E businesses?			
M10 Active and sustainable travel				
66	Are there any other measure we should include to encourage more active travel?	M10 (Mitigation – New build Housing commercial, other)	14	Many comments such as car restrictions in heavily built up areas. Cycle routes, 20mph speed limit, easy to access green space and ebike hire.
67	Should we reference or signpost any other documents?	M10 (Mitigation – New build Housing commercial, other)	9	Ones that support good design for sustainable settlements and green place-making, Consider / refer to measures to ensure existing and new routes are safe, appealing and inclusive. Encourage design which makes active travel the most convenient option for short journeys. Devon Carbon Plan Climate Change Building Car Dependency https://www.transportfornewhomes.org.uk Devon Carbon Plan – Devon Climate Emergency Climate change - GOV.UK (www.gov.uk).
M11 Reducing reliance on the car				
68	Should we resist development proposals that rely upon access solely by the private car?	M11 (Mitigation – New build Housing commercial, other)	29	Mostly yes, some resistance as it can depend on location, also consider EV use means petrol impacts are reducing.
69	Should thresholds be applied – for example bike storage/charging, footpath and cycle way connections, bus routes/funding bus services?	M11 (Mitigation – New build Housing commercial, other)	22	Generally yes. Developments should have bike storage, cyclepath and foot way connections. Para 19.50 also needs to include storage for disability vehicles (Trampers/buggies) to enable less physically active people to be mobile without the need for a car, allowing for charging point for all e-bikes, scooters and buggies.
70	Are there any specific planning measures we could introduce to help reduce reliance on the car?	M11 (Mitigation – New build Housing commercial, other)	15	Developments will need to have Bike storage - all houses Footpath and cycle way connections with restrictions based on size. Reduce parking, require active travel strategies.
71	How should we deal with this issue in the rural areas?	M11 (Mitigation – New build Housing commercial, other)	16	Many suggestions such as discourage remote developments, require travel plans, consider upgrading public transport. Car Share schemes. E bike hire.
72	Should we reference or signpost any other documents?	M11 (Mitigation – New build Housing commercial, other)	9	Transport for New Homes reports and checklists, and Walking for Everyone, What is Healthy Streets? — Healthy Streets
ADAPTATION				

Climate Emergency Planning Statement – Consultation Report



Plymouth and South West Devon Joint Local Plan

73	How rigorously should the Councils' enforce against non-porous hardstanding that do not have planning permission?	A4 (Adaptation – All Development)	18	Generally the response was very rigorously. It should be treated as a planning infringement. It is recognised as a contributor to flooding by some.
74	Should we give increased emphasis to the inclusion of adaptation measures within development schemes?	A5 (Adaptation – All Development)	12	Generally yes. Resistance from developers. There should be greater emphasis on the inclusion of adaptation measures.
75	Are there any additional adaptation issues that should be included?	A5 (Adaptation – All Development)	21	Many suggestions. Including 10%-15% net gain and reusing grey water.
76	Should we introduce a clearer framework for small-scale developments?	A5 (Adaptation – All Development)	12	Generally yes,
77	Do you know of any good examples of simple approaches to deliver biodiversity net gain in small development schemes?	A5 (Adaptation – All Development)	11	Many suggested including requires local expert guidance and advice, needs to be more than a plan. Teignbridge council have a tool to assess the biodiversity of the sites prior to development. and habitat banks, which are areas set up and funded by the council to increase biodiversity and green spaces.
78	Do you think this is a good tool to achieve a wide range of adaptation measures? If not, what alternatives would work better?	Green Space Factor Tool (Adaptation – All Development)	13	Mixed responses, some feel this is too much of an urban tool, some say yes. Biodiversity matrix 3.0 is mentioned as an assessment tool by several commenters.
79	Do you agree that factor scores should be adjusted according to the type and location of sites?	Green Space Factor Tool (Adaptation – All Development)	9	Generally yes
80	Do you have any views about what the thresholds should be?	Green Space Factor Tool (Adaptation – All Development)	15	Repeated comments that biodiversity on new developments should not just be positive but should be at least 10% net gain as measured by the biodiversity matrix 3.0. Some unsure.
81	Should we use this approach to ensure any green space or greenfield windfall development is required to deliver considerable adaptation benefits?	Green Space Factor Tool (Adaptation – All Development)	10	Mixed responses public generally in favour developers resisting.
82	Do you think the Green Space Factor tool could be used effectively and simply to seek	Green Space Factor Tool (Adaptation – All Development)	10	Generally no. Some yes. Request that biodiversity matrix 3.0 is used.



Plymouth and South West Devon Joint Local Plan

Climate Emergency Planning Statement – Consultation Report

	biodiversity net gain from small-scale development?			
83	Do you agree that this tool needs a supporting document to define the different surface types and explain the different factor scores?	Green Space Factor Tool (Adaptation – All Development)	8	Yes
84	Do you think we should provide for carbon offsetting in the event that measures cannot be delivered within the development scheme?	Carbon Offsetting (Adaptation – All Development)	20	Very mixed between respondents. Some note it should be a last resort some argue that if it is required then the design of what is being proposed is wrong.
85	How do we quantify the carbon to offset for each measure?	Carbon Offsetting (Adaptation – All Development)	9	Some resistance for offsetting question not answered.
86	What projects should be included?	Carbon Offsetting (Adaptation – All Development)	11	Local habit banks, not for offsetting. Projects funded through offset should be “extras”, not things like cycle infrastructure or habitat restoration.
87	Do you agree we should require a Statement of Compliance?	Statement of Compliance (Adaptation – All Development)	23	Generally yes. One comment notes the planning system has become increasingly more complicated with long lists both locally and nationally for validation.
88	Should it include anything else?	Statement of Compliance (Adaptation – All Development)	16	More detail in application forms cites. Bath and North East Somerset: sustainable_construction_checklist_spd_version_2_2020_final (2).pdf (bathnes.gov.uk). Consider water saving, management of ground water.
89	Should it be included as part of the validation process and included within the Local Planning Authorities’ validation checklist?	Statement of Compliance (Adaptation – All Development)	17	Generally yes. Some no comments state the planning system is too complex.
90	Does anything else need to be included?	Appendix 4: Glossary	12	Many answers including limits on embodied carbon per m2 for new houses, phased introduction of limits, offer a planning advantage to most thermally efficient, PassivHaus.

Climate Emergency Planning Statement – Consultation Report



Plymouth and South West Devon Joint Local Plan

Climate Emergency Planning Statement – Consultation Report



Plymouth and South West Devon Joint Local Plan