



Oversight and Governance

Chief Executive's Department
Plymouth City Council
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CABINET

Thursday 8 September 2022
3.30 pm
Council House, Plymouth

Members:

Councillor Bingley, Chair
Councillor Shayer, Vice Chair
Councillors Drean, Carlyle, Dr Mahony, Patel, Smith, Stoneman and Wakeham.

Members are invited to attend the above meeting to consider the items of business overleaf. For further information on attending Council meetings and how to engage in the democratic process please follow this link - [Get Involved](#)

Tracey Lee
Chief Executive

Cabinet

Agenda

Part I (Public Meeting)

1. Apologies

To receive apologies for absence submitted by Cabinet Members.

2. Declarations of Interest

Cabinet Members will be asked to make any declarations of interest in respect of items on this agenda. A flowchart providing guidance on interests is attached to assist councillors.

3. Minutes (Pages 1 - 6)

To sign and confirm as a correct record the minutes of the meeting held on 11 August 2022.

4. Questions from the Public

To receive questions from the public in accordance with the Constitution.

Questions, of no longer than 50 words, can be submitted to the Democratic Support Unit, Plymouth City Council, Ballard House, Plymouth, PL1 3BJ, or email to democraticsupport@plymouth.gov.uk. Any questions must be received at least five clear working days before the date of the meeting.

5. Chair's Urgent Business

To receive reports on business which, in the opinion of the Chair, should be brought forward for urgent consideration.

6. Leader's Announcements:

7. Cabinet Member Updates:

8. Finance Monitoring Report Month 4 (To follow):

9. Corporate Plan Quarter 1 2022/23: (Pages 7 - 44)

10. Plymouth Plan Annual Report: (Pages 45 - 80)

11. Climate Emergency Planning Statement: (Pages 81 - 154)

Cabinet

Thursday 11 August 2022

PRESENT:

Councillor Shayer, in the Chair.

Councillors Drean, Dr Mahony, Patel, Smith, Stoneman and Wakeham.

Apologies for absence: Councillors Carlyle and Bingley

The meeting started at 15:00 and finished at 16:07.

Note: The full discussion can be viewed on the webcast of the City Council meeting at www.plymouth.gov.uk. At a future meeting, the Council will consider the accuracy of these draft minutes, so they may be subject to change. Please check the minutes of that meeting to confirm whether these minutes have been amended.

27. **Declarations of Interest**

There were no declarations of interest.

28. **Minutes**

Agreed that the minutes of the meeting held on Thursday 7 July 2022 were a correct record.

29. **Questions from the Public**

Q. Mr Danny Bamping - Can the Council Leader, Richard Bingley, please explain how he intends to rename Sir John Hawkins Square to Zelenskyy Square when Plymouth City Council's Policy on Street Naming clearly states "in order to avoid causing offence, either by inclusion or exclusion, or to appear biased, a street should not be named after a living person or individual."

A. Councillor Richard Bingley – I acknowledged that this is not my decision to be taken. It is a decision to be taken in line with the relevant procedures if and when the Council considers taking this issue forward.

30. **Chair's Urgent Business**

The Chair had no urgent business.

31. **Leader's Announcements**

Councillor Mark Shayer, Deputy Leader of the Council made the following announcements on behalf of the Leader, Councillor Richard Bingley:

- a) Congratulated the Plymouth Athletes who took part in the

Commonwealth Games in Birmingham, on their tremendous performance and for bringing home 5 medals, including Ben Proud (Gold, Swimming 50m Freestyle), Giselle Ansley (Gold, Hockey), Lewis Burras (Silver, Swimming 50m Freestyle), Alison Yearling (Bronze, Lawn Bowls) & Laura Stephens (Bronze, Swimming 200m Butterfly). Councillor Mark Shayer congratulated them on the inspiration they have given younger generations and explained that he looked forward to hearing about their sporting successes in the future.

- b) Councillor Mark Shayer welcomed the announcement that plans for a £33.5million eco-friendly neighbourhood, offering more than 140 new affordable homes in the heart of the city centre has moved forward. This is another example of a ground-breaking scheme by Plymouth Community Homes in partnership with Plymouth City Council. The prospect of so many new homes, including affordable options, in such a key location is very welcome.
- c) Councillor Mark Shayer was pleased to announce, that since the last cabinet meeting, the Council has submitted a pitch for £19.9million of investment under the government's levelling up fund to unlock funding for a package of transitional and transformational infrastructure projects. This bid is result of partnership work across the city. Three key projects have been put forward including a Freeport innovation centre, which will house high value businesses, innovation and start-ups; modernisation of poor infrastructure supporting business growth, high-value jobs and international trade; and transforming the waterfront by repurposing derelict buildings to engage and inspire and train the future workforce.
- d) Garden Waste collections are to end early this year as part of urgent measures to help address a projected £13.6million overspend in the City Council' budget. The final collection round will begin on Monday 15 August 2022. It is estimated this will save around £200,000. The Council is facing a very serious financial position, largely due to national issues. Action has had to be taken now to give the Council a chance of balancing the budget at the end of the financial year 2022/23. Councillor Mark Shayer apologised for the inconvenience this might cause, but hopes that the people of Plymouth understand that the rising costs the Council are experiencing are beyond its control.

32. **Cabinet Member Updates**

Councillor Jonathan Drean, Cabinet Member for Transport presented an update to cabinet and highlighted the following key points:

- a) A visit had been hosted for Baroness Vere of Norbiton from the House of Lords on 25 July 2022. Among the items discussed were the Plymouth Station Regeneration Project; strategic schemes through the major route networks; the infrastructure at the Forder Valley Interchange and Forder Valley Link Road; the Northern Corridor Strategic Cycle Network; the Woolwell to the George Transport interchange scheme; plans for Manadon Roundabout; pop-up e-

chargers on The Hoe; and the EV Ferry;

- b) The CCTV Centre, VMA and UTC Tenders had been circulated and the Highways Team hoped to have upgraded software and hardware in place by next year;
- c) Micro Asphalt treatment 90,000Mtr² had been delivered from September, which is in addition to the yearly surface treatment programme;
- d) Surface Dressing of 40,000Mtr² was complete and is also in addition to the published surface treatment programme;
- e) The Ridgeway Pedestrian upgrade was completed and used recycled slabs and street furniture to reduce costs and carbon emissions;
- f) 6 major junctions had been upgraded to MOVA, funded by TCF2 with another 4 programmed for the 2022/23 financial year;
- g) Commencement of main road lining works using MMA lining that reduces Carbon emissions, lasts longer and improves visibility, this will also see city wide Zebra Crossing remarking, from September 2022.

Councillor Drean updated Cabinet with regard to Cattewater Harbour and highlighted the following key points:

- a) 95% of all cargo in and out of Plymouth, transited through the Cattewater
- b) Cattewater Harbour had facilitated over 2.2 million tonnes of cargo through the port in 2021 and equated to an increase of 370,000 tonnes from the year before;
- c) New export customers had been established in Mexico. Regular shipping routes to Mexico had been underway with the possibility of Egypt coming;
- d) Cargoes included break bulk, clay, fertiliser, salt, liquid cargo, project cargo, animal feed as well as many more, essential to the South West;
- e) Cruise, CHC increased the offering to the city for visiting vessels not wishing to visit ABP;
- f) Port had a programme underway engaging with schools, giving students a hands on experience of trade that passed through Plymouth, as well as opportunities to meet the staff, and an afternoon afloat viewing Port facilities;
- g) 10 apprentices commenced work over an 18 month period in the port;
- h) Millions had been invested into the port over the previous 18 months, from shore cranes to vessels.

Councillor Wakeham, Cabinet Member for Environment & Street Scene presented an update to cabinet and highlighted the following key points:

- a) Apologies to the residents of Plymouth for the early end of Garden Waste Collections, the decision had been very necessary to prevent further budget issues;
- b) Thanked and paid tribute to all of the Council's outdoor workers who had all been working in extreme heat;
- c) Crews had been working to remove weeds from central reservations and kept on top of weeds across the city as they continued to grow.

Councillor Pat Patel, Cabinet Member for Customer Services, Culture, Leisure & Sport presented an update to cabinet and highlighted the following key points:

- a) Thanked the events, leisure, National Marine Park, Street Services teams and partners who ensured Plymouth had the very best events the city had ever had over the summer period;
- b) The digital inclusion network had been recognised at the National SOCITM Awards in winning the award for best outcome for a community group or area;
- c) More than 2,500 children registered for the Summer Reading Challenge with Plymouth Libraries which had been higher than 2021;
- d) The registrations services were in 'wedding season' and conducting many ceremonies each week and were going above and beyond and had been fully committed to individual customer needs, including short notice ceremonies for vulnerable and terminally ill patients. The registration service was also working closely with the Lord Mayor to modernise the citizenship service and ceremony to bring Plymouth's history to life. Councillor Patel encouraged Cabinet Members who had not yet attended a citizenship ceremony to do so;
- e) Sail GP was hosted by Plymouth at the end of July and an estimated 30,000 spectators watched the event from land and water, including HRH Duchess of Cambridge. At least 20 organisations worked in partnership to make the event happen, as well as all the hard work from Plymouth City Council staff. There were 51 millions views of Sail GP Plymouth on TikTok alone, with coverage on Sky Sports. 1137 young people were directly involved in the inspire program including 225 children and adults with additional needs and 150 young people would be gaining sailing qualifications as part of the legacy program;
- f) First anniversary since the Plymouth Sound National Marine Park received £9.5million from the National Lottery Heritage Fund and the benefits of this investment is already being felt across the city with a summer calendar of community activities and over 6,000 residents having

been engaged. The CEO of the Heritage Fund visited Plymouth to mark the anniversary and there was a tour to show what work had already taken place;

- g) The 25 Anniversary of the British Firework Championships would be this year and the event would take place on 17 and 18 August 2022;
- h) West End Carnival would be taking place on 27 August 2022 11am-4pm with a free, family-friendly, fun-packed day;
- i) The Box had been re-awarded the Archive Services Accreditation by The National Archives which recognised good performance in all areas of archive service delivery and was a welcome acknowledgement of the hard work done by colleagues working at The Box.

33. **Finance and Capital Monitoring Report Month 3**

Councillor Mark Shayer, Deputy Leader of the Council presented the report and Tracey Lee, Chief Executive highlighted the following points:

- a) The unprecedented position the Council is in
- b) The importance of finding savings to balance the budget
- c) The forecast for the future

Cabinet agreed to:-

1. Note the forecast revenue monitoring at period three
2. Note the capital expenditure of the capital programme at period three
3. Note the quarter one capital programme update
4. Note the work of the cabinet working group on the commercial income
5. Note the update of the revenue budget environment
6. That the report goes forward for consideration at the next meeting of Full Council on 19 September 2022.

34. **Modern Slavery Update**

Councillor Rebecca Smith, Cabinet Member for Homes & Communities, presented the update.

Cabinet agreed to:-

- 1) Accept the new Modern Slavery Statement and Policy.

35. **Community Equipment Service Contract Award Report**

Councillor Dr John Mahony, Cabinet Member for Health and Adult Social Care and Planning presented the report as well as Emma Crowther, highlighting:

- a) The service was jointly funded between Plymouth City Council and NHS Devon ICB (formerly CCG). They would sign off their part of the decision making process on 17 August 2022.
- b) To support budget, planning prices in the new contract would be held for 12 months for equipment and for 3 years for activities such as cleaning and delivery of equipment.
- c) All providers involved in the procurement had flagged likely future challenges in relation to the cost of service delivery, in particular the cost of fuel.
- d) The outcome of this tender involved a change from the incumbent Millbrook to a new provider, NRS. Time had been built into the project plan to allow for the transfer of equipment and premises to avoid disruption to service users.

Cabinet agreed to:-

- 1) Award the contract of Plymouth Community Equipment Services, for the period 2023 to 2026, to NRS as the highest scoring tender.

Cabinet



Date of meeting:	08 September 2022
Title of Report:	Corporate Plan Performance Report, Q1 2022-23
Lead Member:	Councillor Mark Shayer, Deputy Leader and Cabinet Member for Finance and Economy
Lead Strategic Director:	Giles Perritt (Assistant Chief Executive)
Author:	Rob Sowden (Performance Advisor)
Contact Email:	Robert.sowden@Plymouth.gov.uk
Your Reference:	RSCPQI
Key Decision:	No
Confidentiality:	Part I - Official

Purpose of Report

This is the Corporate Plan Performance report that details how the Council is performing against its priority performance indicators that were agreed at the inception of the Corporate Plan. It provides an analysis of performance as at the end of June 2022 against the Council's key performance indicators (KPIs), providing a detailed performance update against the Corporate Plan priorities.

This report forms part of the Council's Delivery and Performance Framework and is a key part of our aim to achieve a 'golden thread' from the Corporate Plan and its KPIs and delivery plans, through to service and team level business plans, and ultimately to individual objectives.

Areas of good performance this quarter include:

- Employment rate increase (Page 8)
- Repeat referrals to Children's Social Care (Page 19)
- Improved ASC safeguarding outcomes (Page 21)

Performance Challenges are:

- Children with multiple child protection plans (Page 21)
- FTE days lost to sickness (Page 25)
- Spend against budget (Page 28)

There are a small number of indicators that are presented as narrative, this is due to indicators still being subject to due diligence prior to reporting, or it is not possible to report data due to COVID-19.

In addition to the Corporate Plan Performance, a report providing a progress update against the delivery plan unveiled by the Leader in July will be attached as an appendix to this report.

Recommendations and Reasons

That Cabinet:

- I. Notes the Performance Reports

Reason: To update Cabinet on the performance of the Council in terms of progress in delivering against the Corporate Plan / Delivery Plan and to inform future items of scrutiny.

Alternative options considered and rejected

The Corporate Plan performance report is a key reporting document that provides transparency on the Council's performance and as such reporting this performance is considered best practice.

Relevance to the Corporate Plan and/or the Plymouth Plan

This report is fundamentally linked to delivering the priorities within the Council's Corporate Plan.

Implications for the Medium Term Financial Plan and Resource Implications:

The Medium Term Financial Strategy is a core component of the Council's strategic framework and has a vital role to play in translating the Council's ambition and priorities set out in the Corporate Plan 2021-25.

Financial Risks

Associated risk regarding performance are managed within the strategic and operational risk registers.

Carbon Footprint (Environmental) Implications:

Environmental sustainability is a key priority of the administration, and the waste management, recycling and traffic management commitments are specifically aimed at reducing the city's carbon footprint.

Other Implications: e.g. Health and Safety, Risk Management, Child Poverty:

* When considering these proposals members have a responsibility to ensure they give due regard to the Council's duty to promote equality of opportunity, eliminate unlawful discrimination and promote good relations between people who share protected characteristics under the Equalities Act and those who do not.

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Appendices

*Add rows as required to box below

Ref.	Title of Appendix	Exemption Paragraph Number (if applicable) <i>If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part 1 of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.</i>						
		1	2	3	4	5	6	7
A	Corporate Plan Performance Report, Quarter One 2022/23							
B	Plymouth's future: Our Opportunity, Our Delivery Plan Progress Report – (To follow)							

Background papers:

*Add rows as required to box below

Please list all unpublished, background papers relevant to the decision in the table below. Background papers are unpublished works, relied on to a material extent in preparing the report, which disclose facts or matters on which the report or an important part of the work is based.

Title of any background paper(s)	Exemption Paragraph Number (if applicable)
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	If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part 1 of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.						
	1	2	3	4	5	6	7

Sign off:

Fin	djn.2 2.23. 195	Leg	EJ/38 851/2 4.8.22	Mon Off	.	HR	.	Asset s	.	Strat Proc	.
Originating Senior Leadership Team member: Giles Perritt (Assistant Chief Executive)											
Please confirm the Strategic Director(s) has agreed the report? Yes Date agreed: 23/08/2022											
Cabinet Member approval: Councillor Mark Shayer Date approved: 25/08/2022											

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CORPORATE PLAN PERFORMANCE REPORT

Quarter one 2022/23



PLYMOUTH CITY COUNCIL CORPORATE PLAN 2021-2025

The Plymouth City Council Corporate Plan 2021-2025 sets out our mission of Plymouth being *one of Europe's most vibrant waterfront cities, where an outstanding quality of life is enjoyed by everyone*. It was approved by Full Council in June 2021.

The Corporate Plan priorities are delivered through specific programmes and projects, which are coordinated and resourced through cross-cutting strategic delivery plans, capital investment and departmental business plans.

The key performance indicators (KPIs) and their associated targets detailed in this report for the first quarter of 2022/23 (April to June 2022) tell us how we are doing in delivering what we have set out to achieve in the Corporate Plan.

OUR PLAN

YOUR CITY, YOUR COUNCIL



CITY VISION

Britain's Ocean City

One of Europe's most vibrant waterfront cities, where an outstanding quality of life is enjoyed by everyone.

OUR MISSION To build back better and make Plymouth a great place to live, work and visit.

OUR VALUES we are:

DEMOCRATIC

Plymouth is a place where people can have their say about what is important to them and where they are empowered to make change happen.

RESPONSIBLE

We take responsibility for our actions, we are accountable for their impact on others and the environment and expect others to do the same.

FAIR

We will be honest and open in how we act. We will treat everyone with respect, champion fairness and create opportunities.

COLLABORATIVE

We will provide strong community leadership, working with residents, communities and businesses to deliver our common ambition.

OUR PRIORITIES

UNLOCKING THE CITY'S POTENTIAL

- A clean and tidy city
- A green, sustainable city that cares about the environment
- Offer a wide range of homes
- A vibrant economy, developing quality jobs and skills
- An exciting, cultural and creative place
- Create a varied, efficient, sustainable transport network

CARING FOR PEOPLE AND COMMUNITIES

- A friendly welcoming city
- Reduced health inequalities
- People feel safe in Plymouth
- Focus on prevention and early intervention
- Keep children, young people and adults protected
- Improved schools where pupils achieve better outcomes

DELIVERING ON OUR COMMITMENTS BY:

Empowering our people to deliver

Providing a quality service to get the basics right first time

Engaging with and listening to our residents, businesses and communities

Providing value for money

Championing Plymouth regionally and nationally

The purpose of this report is to provide a risk-informed analysis of performance against the priorities of the Corporate Plan 2021-2025. The priorities are grouped under 'unlocking the city's potential' and 'caring for people and communities', and the outcomes for 'delivering on our commitments' – the enablers of the Corporate Plan – are also reported on.

Direction of travel (RAG) colour scheme

A red-amber-green (RAG) direction of travel rating is provided to give an indication of whether performance is improving or declining based on the two latest comparable periods for which information is available. For example, repeat referrals to Children's Social Care is compared to the previous quarter; household waste sent for reuse, recycling or composting is compared to the same period in the previous year (due to seasonality); and annual measures, such as public satisfaction with traffic flow, are compared to the previous year.

- Indicators with arrows highlighted **green**: improved on the previous value or on an expected trend
- Indicators with arrows highlighted **amber**: within 15% of the previous value (slight decline)
- Indicators with arrows highlighted **red**: declined by more than 15% on the previous value
- Indicators with arrows that are not highlighted have no direction of travel or the most recent value is not comparable with previous values.

Target (RAG) colour scheme

A RAG target rating is applied for indicators that have a target. For these indicators, the bar for the latest reporting period is coloured either red, amber or green in the chart and in the table to visually display how we are performing compared with the target.

- Indicators highlighted **green** show where Plymouth is better than target
- Indicators highlighted **amber** show where Plymouth is within 15% of target
- Indicators highlighted **red** show where Plymouth is more than 15% worse than target
- Indicators not highlighted or 'N/A' show where no in year data is available to compare against target, or no target has been set.

Summary page

A performance summary section is presented at the start of this report to visually display how we have performed against our Corporate Plan priorities. Our RAG rating on these pages is used to show whether we have done better, worse or had a slight decline from the previous quarter or year (coloured arrows), and whether we have done better, worse or got close to the target (coloured boxes). Some indicators do not have a target (for example, due to being a new indicator) and will therefore have no target RAG rating. Similarly, some of our indicators are new and we do not have any previous data to compare our performance to or it is not appropriate to compare to previous data; these will have no direction of travel RAG rating in the summary pages.

Description of key performance indicators

Tables containing the names and descriptions of all of the key performance indicators featured within this report are presented at the end of the document.

Impact of COVID-19 on performance

The COVID-19 pandemic has had far reaching impacts across all services. Impacts that the COVID-19 pandemic has had on performance is referenced throughout the report. The pandemic has also impacted upon the ability to report on performance against some indicators as we would have done so previously. Where performance against an indicator has not been able to be quantified, a narrative update has been provided in its place. The narrative outlines activity that has been undertaken or the challenges faced.

UNLOCKING THE CITY'S POTENTIAL					
Priority	Key performance indicators	2021/22 outturn	Previous performance*	Latest performance	Page
A clean and tidy city	1. Streets graded at an acceptable standard for overall street cleanliness and grounds maintenance	89.0%	88.8% ^Q	89.0%	▲ 6
A green sustainable city that cares about the environment	2. Household waste sent for recycling, reuse or composting	37.0%	37.3% ^C	36.6%	▼ 6
	3. Average number of cycle trips taken on DfT count day	Not yet available	134 ^A	183	▲ 6
	4. Carbon emissions emitted by the council		Narrative update		7
Offer a wide range of homes	5. Net additional homes delivered in the city (cumulative from 2014/15)	Not yet available	5,301 ^A	5,836	▲ 8
A vibrant economy, developing quality jobs and skills	6. Spend on small and medium enterprises	23.8%	23.8% ^Q	23.3%	▼ 8
	7. Spend within the PL postcode	54.5%	54.5% ^Q	58.4%	▲ 8
	8. 16-18 year olds in education, employment or training	91.4%	90.5% ^C	90.6%	▲ 8
	9. Employment rate	75.5%	75.4% ^Q	75.5%	▲ 8
	10. Number of businesses supported through COVID-19 business grants	6,029	17 ^Q	787	▲ 8
	11. Inward investment	Not yet available	£334.408m ^A	£194.339m	▼ 8
	12. Inclusive growth (earnings gap)	Not yet available	£364.70 ^A	£338.20	▼ 8
An exciting, cultural and creative place	13. Number of visitors to Plymouth	Not yet available	5,279,000 ^A	2,436,000	▼ 11
Create a varied, efficient, sustainable transport network	14. Principal roads (A) in good or acceptable condition	97.7%	97.8% ^A	97.7%	▼ 12
	15. Public satisfaction with traffic flow	38%	44% ^A	38%	▼ 12
	16. Carriageway defects completed on time	96.9%	96.9% ^Q	92.4%	▼ 12

CARING FOR PEOPLE AND COMMUNITIES					
Priority	Key performance indicators	2021/22 outturn	Previous performance*	Latest performance	Page
A friendly welcoming city	1. Residents who think people from different backgrounds get on well together	55%	39% ^A	55%	▲ 15
	2. Residents who regularly do voluntary work	Not yet available	43% ^A	42%	▼ 15
Reduced health inequalities	3. Stop smoking service successful quit attempts	47.0%	47.0% ^Q	47.0%	- 16
	4. Excess weight in 10-11 year olds	Not yet available	31.9% ^A	33.5%	▲ 16
	5. Eligible pupils taking benefit based Free School Meals (FSM) as a percentage of whole pupil population	17.2%	18.6%	17.2%	▼ 16
	6. School readiness		Narrative update		17
People feel safe in Plymouth	7. Number of anti-social behaviour incidents reported to the council	625	106 ^Q	146	▲ 18
	8. Number of early interventions to anti-social behaviour	194	47 ^Q	43	▼ 18

	9. Residents who feel safe (during the day)	Not yet available	91% ^A	90%	▼	18
	10. Repeat referrals to Children's Social Care	22.6%	22.6% ^Q	22.5%	▼	19
Focus on prevention and early intervention	11. Households prevented from becoming homeless or relieved of homelessness	839	244 ^Q	204	▼	19
	12. Number of people rough sleeping	9	9 ^Q	15	▲	19
	13. Long-term support needs met by admission to residential and nursing care homes (65+)	239	52 ^Q	69	▲	19
	14. Children in care (rate per 10,000)	91.9	91.9 ^Q	92.5	▲	21
Keep children, young people and adults protected	15. Children with multiple child protection plans	27.5%	27.5% ^Q	29.2%	▲	21
	16. Closed adult safeguarding enquiries with desired outcomes fully/partially achieved	95.4%	92.5% ^Q	95.3%	▲	21
	17. Adult social care service users who feel safe and secure	87.9%	90.0% ^A	87.9%	▼	21
Improved schools where pupils achieve better outcomes	18. Percentage of early years settings judged by Ofsted as good or outstanding	97.0%	97.0% ^Q	97.0%	-	22
	19. Percentage of pupils attending schools judged by Ofsted as good or outstanding	77.1%	77.1% ^Q	78.6%	▲	22
	20. Percentage of Key Stage 4 pupils achieving the Basics (5+ in English and Maths)	Not yet available	47.1% ^A	51.9%	▲	22

DELIVERING ON OUR COMMITMENTS						
Priority	Key performance indicators	2021/22 outturn	Previous performance*	Latest performance		Page
Empowering our people to deliver	1. FTE days lost due to staff sickness	8.74	8.74 ^Q	8.84	▲	25
	2. Staff engagement		Narrative update			26
Providing a quality service to get the basics right first time	3. Customer experience score	77.1%	66.7% ^Q	83.3%	▲	26
Engaging with and listening to our residents, businesses and communities	4. Residents who know how to get involved in local decisions	No survey	30.8% ^A	33.7%	▲	27
Providing value for money	5. Spend against budget (£million)	-£0.349m	-£0.349m ^Q	£9.931m	▲	28
	6. Council tax collected	96.8%	28.4% ^C	27.8%	▼	28
	7. Business rates collected	98.7%	37.5% ^C	35.4%	▼	28
Championing Plymouth regionally and nationally	8. Offers and Asks		Narrative update			29
	9. Regional influence		Narrative update			29

*The previous performance reported in the tables presents the latest comparable performance:

A: Annual or bi-annual measures – performance from the latest reported year is compared to the previously reported year, for example 2020/21 compared with 2019/20.

Q: Quarterly measures – performance from the latest reported quarter is compared to the previously reported quarter, for example quarter four 2021/22 compared with quarter three 2021/22.

C: Comparable period – performance from the latest reported period is compared to the same period in the previous year, either due to seasonality (recycling rate and young people in education, employment or training) or because they are cumulative measures (council tax and business rates).

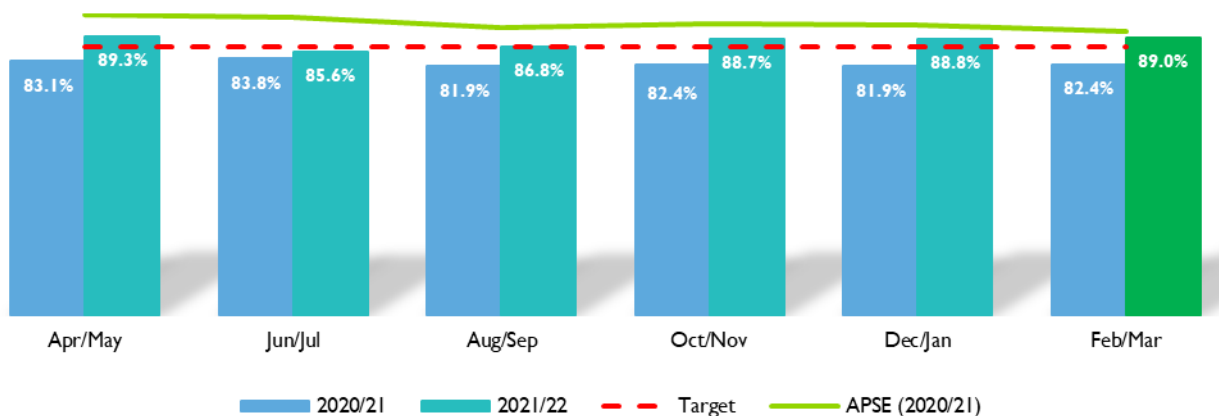
Unlocking the city's potential

- ***A clean and tidy city***
- ***A green, sustainable city that cares about the environment***
- ***Offer a wide range of homes***
- ***A vibrant economy, developing quality jobs and skills***
- ***An exciting, cultural and creative place***
- ***Create a varied, efficient, sustainable transport network***

I. Streets graded at an acceptable standard for overall street cleanliness and grounds maintenance (cumulative)

Financial year	Apr/May	Jun/Jul	Aug/Sep	Oct/Nov	Dec/Jan	Feb/Mar	Direction of travel	Target
2020/21	83.1%	83.8%	81.9%	82.4%	81.9%	82.4%		
2021/22	89.3%	85.6%	86.8%	88.7%	88.8%	89.0%	▲	86.7%

Street cleanliness, grounds maintenance and hard surface weeds acceptable standard score

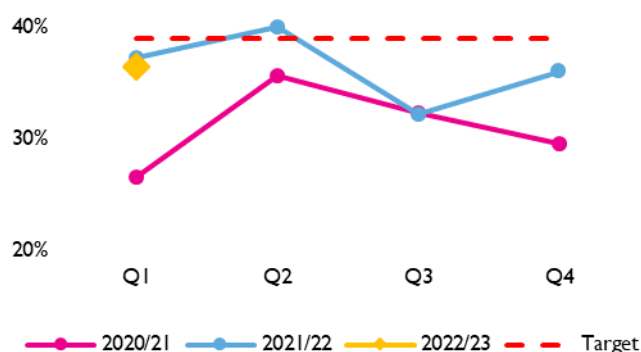


The overall acceptable standard score for combined street cleanliness and grounds maintenance increased following the addition of the February and March 2022 audits to 89.0%. This is above our target but remains below the APSE (92.8%) and family group (91.9%) averages, with the gaps standing at 3.8 and 2.9 percentage points, respectively. The high score at the beginning of the year was influenced by an improvement in the score for hard surface weeds (86.7% acceptable in Apr/May; previous high was 76.9% in Feb/Mar 2018/19). While performance has since declined, with 82.7% of the total inspected streets this year being acceptable for hard surface weeds, this remains very high in comparison to previous years. Despite operating within the challenges posed by COVID-19, for the second consecutive year we conducted audits and submitted results to APSE for all six measurement periods in 2021/22.

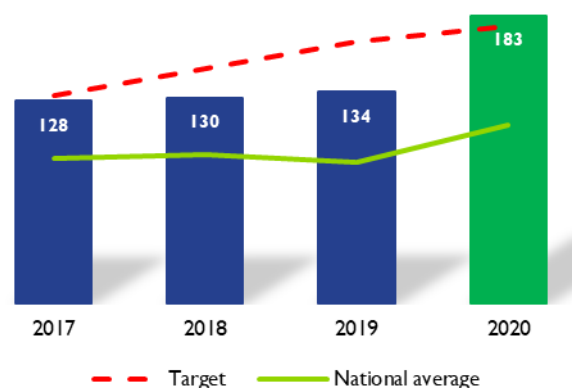
A green sustainable city that cares about the environment

Quarterly KPI	Q2 2021/22	Q3 2021/22	Q4 2021/22	Q1 2022/23	Direction of travel	Target
2. Household waste sent for recycling, reuse or composting	40.1%	32.3%	36.1%	36.6%	▲	39%
Annual KPI	2017	2018	2019	2020	Direction of travel	Target
3. Average number of cycle trips taken on DfT count day	128	130	134	183	▲	176

Percentage of household waste sent for recycling, reuse or composting



Average number of cycle trips taken on Department for Transport count day



The recycling rate for quarter four increased to 36.6% but remains below the target of 39%. There was a drop in the recycled household material in quarter one but we had much more composted material from the garden waste collections, which balanced it out, to end the quarter only slightly below quarter one 2021/22 (37.3%).

The Department for Transport (DfT) undertakes one day cycle counts on approximately 40 roads across the city, once a year, every year. This dataset provides a reasonably consistent annual snapshot of levels of on road cycling in the city that can be used as an indicator of the extent of growth in the use of sustainable transport. The Government's 2017 Cycling and Walking Strategy target is to double cycling by 2025. To support reaching the 2025 target of 256 cyclist counts in Plymouth, the 2020 target was 176. In 2020, Plymouth exceeded its target and the levels of cycling across the country is following similar trends. There has been increased investment through the Transforming Cities Fund and Active Travel Fund, and we are hopeful that significant additional funding will be forthcoming in the years ahead to support the Government's 2017 Cycling and Walking Strategy. The substantial increase from 2019 to 2020 can be attributed to travel choice changes brought about by COVID-19, but also partially attributed to cycling infrastructure and the complimentary Plymotion programme delivered by the council. Data for 2021 will be available later in 2022.

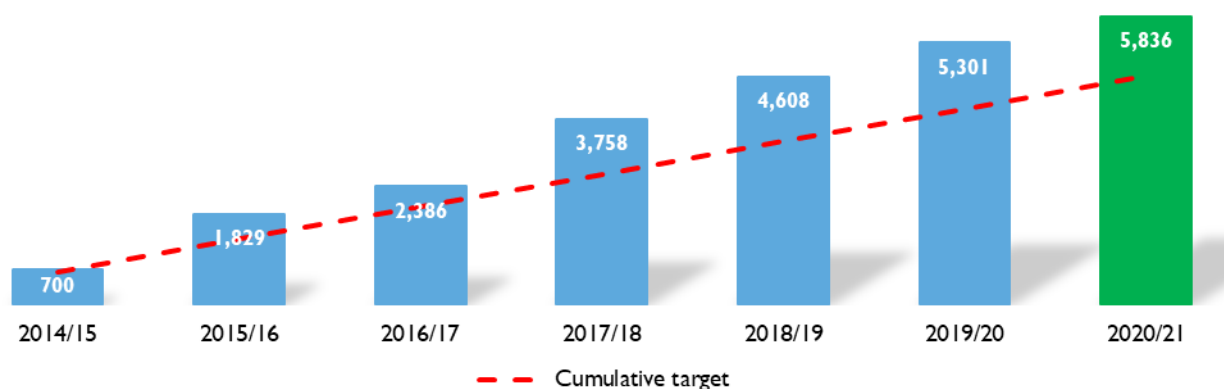
4. Carbon emissions emitted by the council

This update now reports on progress being made in relation to the actions of the Corporate Carbon Reduction Plan 2022, which was agreed by the City Council at its meeting on 24 January 2022. The first four months of 2022 have seen some very positive progress; 9% of all actions have been 'completed', 86% are 'underway' and 6% have not progressed yet. Highlights include:

- The plan to finalise a grassland management policy has been achieved and shared with all councillors. The new policy seeks to balance the approach to grassland management between people and nature.
- We sought to undertake a review of school transport procurement criteria and routes to reduce emissions from 2023. This has been completed with all routes reviewed and following assessment, the number of routes has been reduced where it was possible to do so.
- The plan to update the Taxi Policy to encourage greener vehicles and work with taxi drivers and operators to move towards an Ultra-Low Emission Vehicle taxi fleet by 2030 has been completed and the policy implemented from the 1 May 2022.

Annual KPI	2017/18	2018/19	2019/20	2020/21	Direction of travel	Target
5. Net additional homes delivered in the city (cumulative from 2014/15)	3,758	4,608	5,301	5,836	▲	4,620

Net additional homes delivered in the city (cumulative)



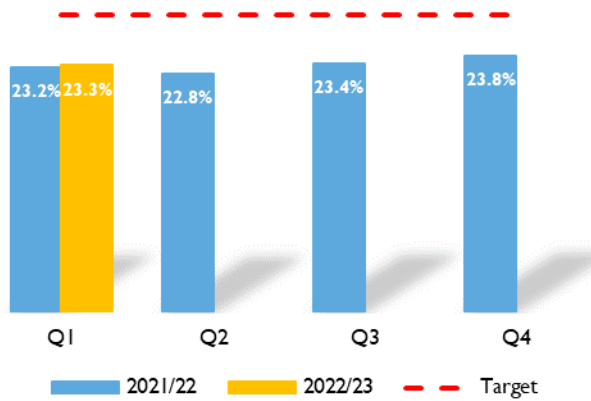
Delivery is on track to meet the Plymouth Local Planning Authority (LPA) area target set out in the Joint Local Plan of 13,200 net additional dwellings to be delivered over the period 2014 to 2034 (annualised to 660 dwellings per annum). We have delivered 5,836 net additional dwellings over the period 2014 to 2021 and are currently significantly ahead (by 1,216 dwellings) of the Plymouth LPA cumulative target (4,620 net additional dwellings over the period 2014 to 2021). Of the 5,836 homes, 984 were affordable homes, which is an annualised average of 141 (17% of net housing delivery). However, this hides the significant amount of new affordable housing that has been delivered over the period (1,674 dwellings), accounting for 25% of gross housing delivery (6,682 dwellings). The major regeneration areas of Devonport, North Prospect and Barne Barton have seen the demolition of 690 poor quality affordable homes being replaced by the provision of new high quality affordable homes. The next update will be in autumn 2022.

A vibrant economy, developing quality jobs and skills

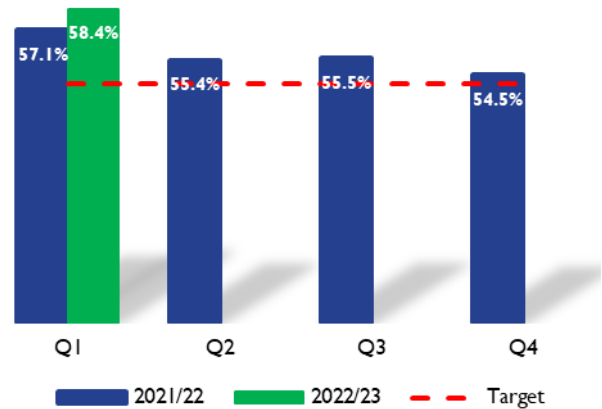
Quarterly KPIs	Q2 2021/22	Q3 2021/22	Q4 2021/22	Q1 2022/23	Direction of travel	Target
6. Spend on small and medium enterprises (SME)	22.8%	23.4%	23.8%	23.3%	▼	26%
7. Spend within the PL postcode	55.4%	55.5%	54.5%	58.4%	▲	54%
8. 16-18 year olds in education, employment or training	Not reported	90.7%	91.4%	90.6%	▼	92%
9. Employment rate (16-64 population, rolling 12 months)	77.2%	75.4%	75.5%	Not yet available	▲	Trend increase
10. Number of businesses supported through COVID-19 business grants	82	17	787	N/A	▲	Monitor

Annual KPIs	2017/18	2018/19	2019/20	2020/21	Direction of travel	Target
11. Inward investment	£162.952m	£265.807m	£334.408m	£194.339m	▼	Monitor
12. Inclusive growth (earnings gap)	£355.10	£350.30	£364.70	£338.20	▼	Trend decrease

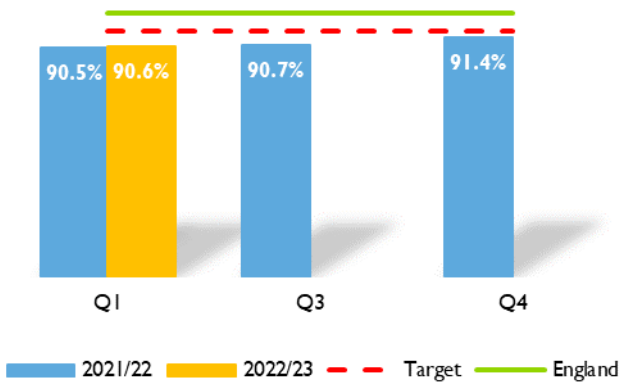
Percentage of spend on small and medium enterprises (YTD)



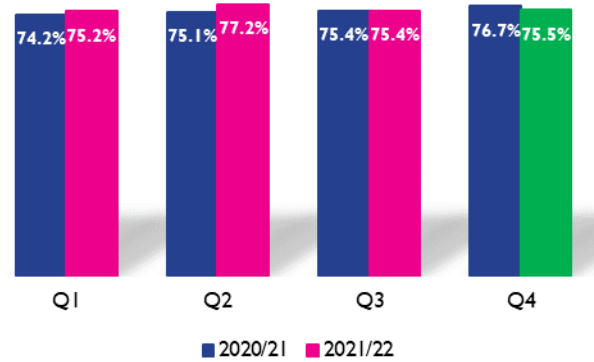
Percentage of spend in the PL postcode (YTD)



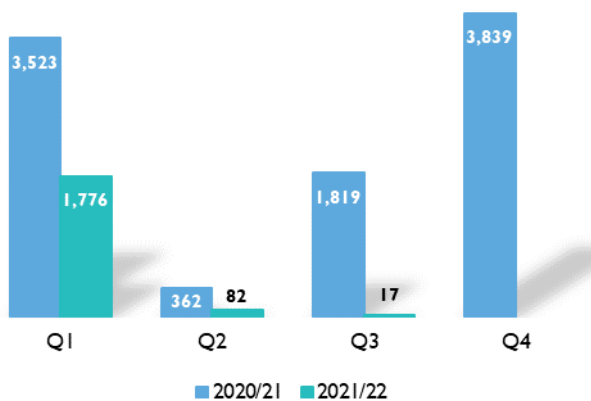
Percentage of young people in education, employment or training



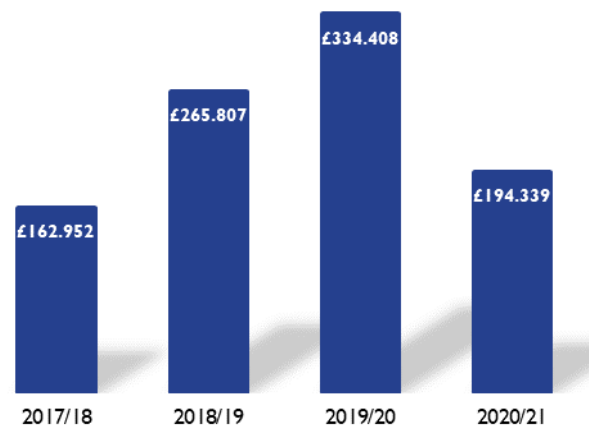
Percentage of 16-64 year olds in employment (rolling 12 months)



Number of businesses supported through COVID-19 business grants



Value of inward investment (£million)



Gap in wages between the 20th and 80th percentile



In 2022/23 to date, 23.3% of our total procurement spend has been spent on small and medium sized enterprise (SME) suppliers, which is a decrease of 0.5 of a percentage point when compared to the end of 2021/22. This equates to approximately £24.167 million out of a total spend of £103.719 million and is above our percentage spend at the end of quarter one 2021/22 (23.2%) but remains below our target of 26%. Throughout the quarter we used 651 different SME suppliers, which translates to 35.4% of all of the suppliers that we have used being a SME (down on 39.7% at the end of 2021/22).

Approximately £60.546 million was spent on PL postcode suppliers in quarter one 2022/23 out of a total spend of £103.719 million, equating to 58.4%. This is above the percentage spend in 2021/22 (54.5%) and remains above our 54% target. During quarter one, we procured goods and services through 1,106 suppliers based within the PL postcode, which is 60.1% of the total number of suppliers used within the quarter and an increase on the 54.1% used in 2021/22.

At the end of quarter one, the proportion of 16 and 17 year olds in education, employment, and/or training (EET) was 90.6%; this is slightly better than the EET figures at the same time last year (90.5%). At the end of quarter one, 83.3% of young people with Special Educational Needs and/or Disabilities (SEND) were in education, training and/or employment, which is slightly above EET figures at the end of quarter one 2021/22 (83.2%). Careers South West (CSW) advisers are focused on supporting all young people who still have not specified their intended destination or who have confirmed that they are not in education, employment or training (NEET). The local authority and CSW are developing a data sharing protocol to support young people who are electively home educated. This group of young people is identified as at risk of not engaging in post-16 provision as they may not receive high quality advice and guidance on career options or skills before the end of their statutory education.

The employment rate of the working age population of Plymouth saw a steady increase from quarter one 2020/21 through to quarter four 2020/21. However, the employment rate for 2021/22 has appeared to stabilise slightly above 75%. The latest data for quarter four 2021/22 showed the rate to increase marginally to 75.5%, meaning that Plymouth had a higher employment rate than Great Britain (75.2%).

The COVID-19 pandemic has fundamentally altered the way in which Economic Development is supporting businesses. The latest estimate of the total number of unique businesses supported by COVID-19 grants since March 2020 in Plymouth is 6,029. All COVID-19 grants concluded on 31 March 2022, so there will be no new quarterly numbers to report. The department continues to collaborate and work with businesses to understand their pressures and offer as much support as possible, with a more relevant measure to track this support currently being considered.

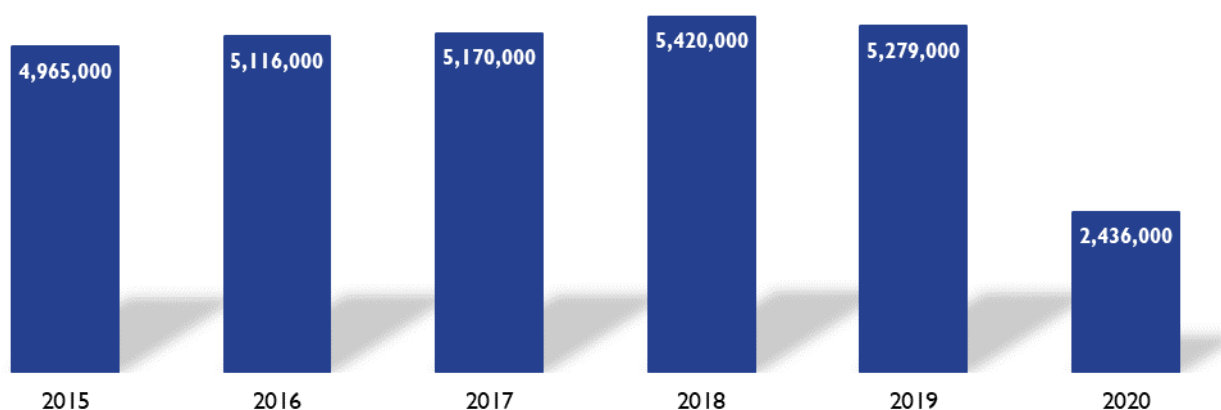
As projected, the total number of Foreign Direct Investment (FDI) landings in the year 2021/22 dropped again from seven in 2020/21 to just four, with a total value of £4.6 million. This drop is attributed to the ongoing broad macro-economic factors that are present across the world, with the COVID-19 pandemic and the Ukraine war being the most prominent; both continue to have an effect on the supply chains and customer base for some of our major investors. Despite this drop, the pipeline for 2022/23 projects an upward trajectory as businesses acclimatise to the new normal and investment plans begin to come to fruition. A number of the major companies in the city are attracting and landing funds to enhance their local capabilities. Important for Plymouth moving forward will be the continued support of the Plymouth and South Devon Freeport, which will drive investment activity, alongside the existing world leading offer that we have in marine capabilities, advanced manufacturing and engineering, and the defence sector through initiatives such as the South West Regional Defence and Security Cluster.

The health and wellbeing of a number of communities has been disproportionately impacted by the COVID-19 pandemic and those with existing barriers to the labour market have been further displaced. The Resurgam Charter and COVID-19 Channel Area Response Exchange (C-CARE) projects aim to address some of these negative impacts for communities across Plymouth. Since its launch in March 2021, the Resurgam Charter has engaged hundreds of businesses and secured over 220 signatories, including engagement from local businesses as well as some of the city's biggest employers; currently, 83 are regularly engaged with the project. Through the project and its themes there are regular co-design groups, which roll out to well attended workshops, with attendance growing. C-CARE launched in April 2021 and has been driving individual and collective action to amplify activities that are addressing the challenges identified across all five themes of the Resurgam Charter. C-CARE will provide support to at least 200 businesses and use community organisations to engage 500 individuals with skills action plans. Activity will also include concentrating on providing opportunities to upskill employees of Plymouth businesses and the development of an Employer Hub to support businesses in Plymouth.

An exciting, cultural and creative place

Annual KPI	2017	2018	2019	2020	Direction of travel	Target
13. Number of visitors to Plymouth	5,170,000	5,420,000	5,279,000	2,436,000	▼	Monitor

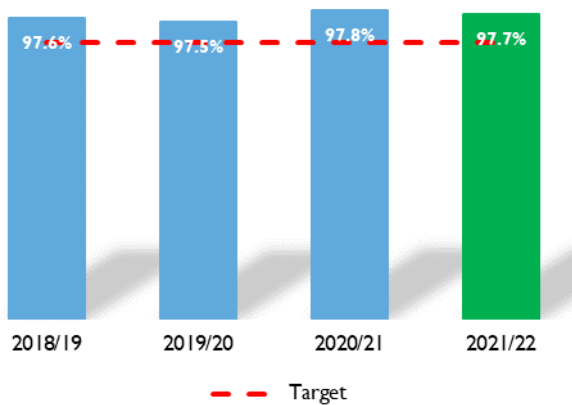
Number of visitors to Plymouth



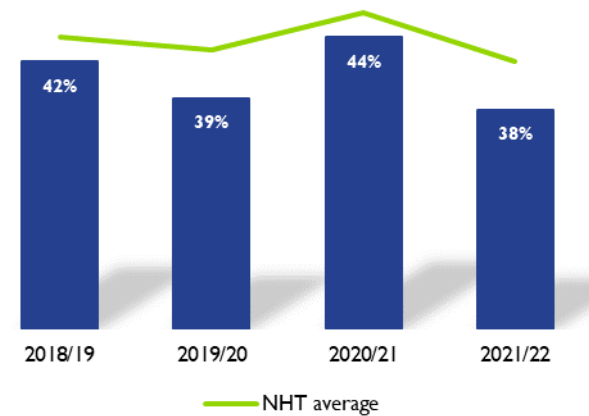
COVID-19 hit the tourism, hospitality, leisure and retail sectors very hard during 2020; overall there was a 54% loss of visitors from 2019 and a 56% loss of spend - from £334 million down to £148.4 million. This was due to lockdowns from March to July and then again in the back end of the year. International travel was hit particularly hard, losing 74% of visitors. The COVID-19 impacts continue to be felt by the visitor sector in the city and nationally. Our modelling shows that although there was an average uplift of 10% visitor spend over June to August due to 'staycations' in the region, it was not significant enough to offset the losses in the early part of the year. Currently we are forecasting a loss of over £270 million in spend for 2021 but we do not yet have December's data. Full 2021 data will be available later in the year. Targets are being revised as we now have a new long term target forecast of 6.2 million visitors by 2030.

Annual KPIs	2018/19	2019/20	2020/21	2021/22	Direction of travel	Target
14. Principal roads (A) in good or acceptable condition	97.6%	97.5%	97.8%	97.7%	▼	97%
15. Public satisfaction with traffic flow	42%	39%	44%	38%	▼	Monitor
Quarterly KPI	Q2 2021/22	Q3 2021/22	Q4 2021/22	Q1 2022/23	Direction of travel	Target
16. Carriageway defects completed on time (cumulative)	99.0%	97.8%	96.9%	92.4%	▼	97%

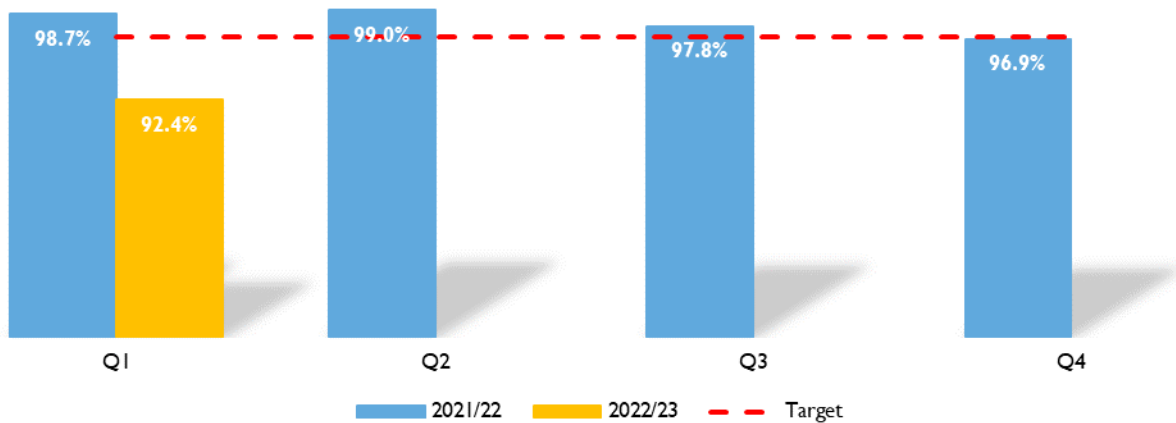
Percentage of principal roads (A) in good or acceptable condition



Public satisfaction with traffic levels and congestion



Percentage of carriageway defects completed on time (cumulative year to date)



2021/22 saw a slight decline from 97.8% to 97.7% of principal (A) roads that were in a good or acceptable condition. By continuing our regime of monitoring, we have managed to make informed and targeted decisions about where we need to invest in our resilient highway network to ensure that an optimal and planned condition is maintained.

The 2021 National Highways and Transport (NHT) survey showed a fall in public satisfaction with traffic levels and congestion, with 38% of respondents being satisfied compared with 44% in 2020. A similar decline was evident across the country, with the NHT average satisfaction falling by four percentage points to 42% in 2021, meaning that our gap with the NHT average currently stands at four percentage points. Based on the nationwide pattern of a fall in satisfaction with traffic flow and congestion, it is likely that the COVID-19 pandemic had a notable impact on people's responses to the survey; due to the government restrictions and stay at home advice, there were fewer vehicles using the network in 2020, whereas 2021 saw many of these restrictions relax and a subsequent increase in road use. Moreover, a backlog on statutory utility maintenance will have further exacerbated the situation, which is unlikely to improve in the next six months. We have also seen the continuation of several network improvement programmes in Plymouth and remain focused on maintaining the quality and functionality of the resilient network in line with our Asset Management Framework.

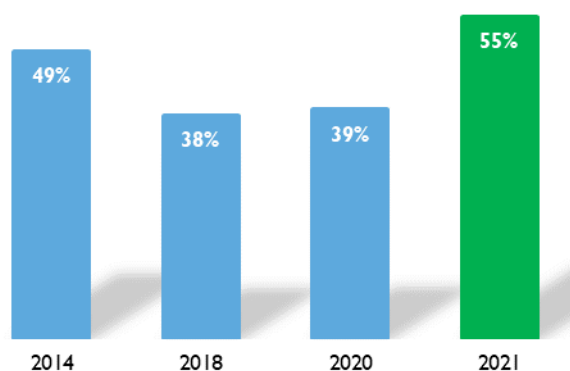
In quarter one 2022/23, 514 of the total 556 carriageway defects were completed within the required timescales, equating to 92.4% and falling short of the target of 97%. It is also a decline on the total 96.9% achieved in 2021/22. This measure includes carriageway defects carried out over three differing priorities with different timescales for completion. The resourcing and supply chain issues continued in quarter one, which led to a decline in the timeliness of responding to carriageway defects.

Caring for people and communities

- ***A friendly welcoming city***
 - ***Reduced health inequalities***
 - ***People feel safe in Plymouth***
- ***Focus on prevention and early intervention***
- ***Keep children, young people and adults protected***
- ***Improved schools where pupils achieve better outcomes***

Plymouth City Survey (2020 collected pre-pandemic)	2014	2018	2020	2021	Direction of travel	Target
1. Residents who think their local area is a place where people from different backgrounds get on well together	49%	38%	39%	55%	▲	Trend increase
2. Residents who regularly do voluntary work	-	43%	42%	-	▼	Trend increase

Percentage of Plymouth City Survey respondents who think their local area is a place where people from different backgrounds get on well together



Percentage of Plymouth City Survey respondents who volunteer or help out

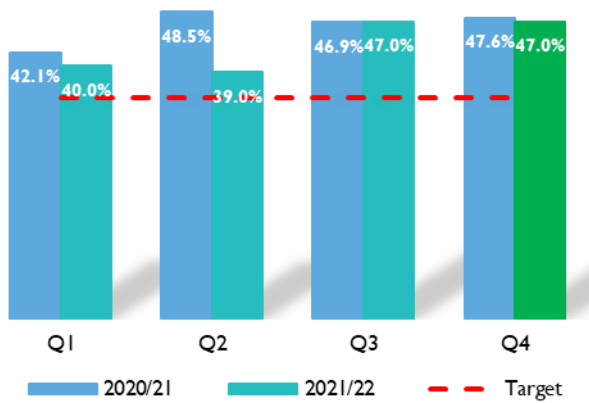


The question regarding residents who think that their local area is a place where people from different backgrounds get on well together was asked in the 2021 Resident Survey (same methodology as the Plymouth City Survey). Results show that 55% of respondents agreed that Plymouth is a place where people from different backgrounds get on well together, while 35% answered ‘neither agree nor disagree’ or ‘don’t know’. Plymouth’s cohesion score is currently 86%; this excludes the neutral options and is a significant increase from 74% in 2020. We have published our equality and diversity calendar, which was approved by the Equalities Working Group earlier this year. Our equality and diversity calendar sets out the key equality and diversity related dates, which we plan to mark throughout the year. Specific cohesion related dates that we have marked this year so far include Holocaust Memorial Day, Refugee Week and several religious occasions. We are continuing to mark the dates within the calendar internally and externally.

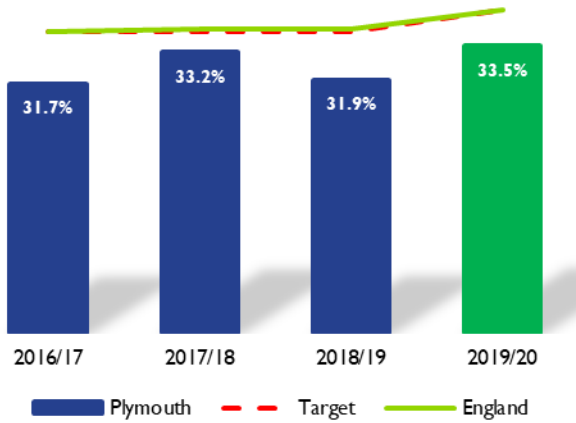
Volunteering continues to thrive in the city. At the time of writing the numbers of volunteers directly associated with Plymouth City Council is 346. These include people on the Good Neighbours Support scheme and those working with Poole Farm, the Youth Justice Service, our Youth Services team, Plymouth Information Advice and Support for SEND team, and The Box and Elizabethan House. Recent additions have included the recruitment of 110 volunteers to support Ocean City Events such as SailGP, and 40 volunteers who have signed up for the Summer Reading Challenge. We will soon be recruiting a team of Climate Ambassadors, who will act as advocates in their communities for positive action across all neighbourhoods of the city.

Quarterly KPI	Q1 2021/22	Q2 2021/22	Q3 2021/22	Q4 2021/22	Direction of travel	Target
3. Stop smoking service successful quit attempts	40.0%	39.0%	47.0%	47.0%	▲ ▼	35.0%
Annual KPIs (academic year)	2018/19	2019/20	2020/21	2021/22	Direction of travel	Target
4. Excess weight in 10-11 year olds	31.9%	33.5%	Not recorded	Not yet available	▲	35.2%
5. Eligible pupils taking benefit based Free School Meals (FSM) as a percentage of whole pupil population	13.4%	14.8%	18.6%	17.2%	▼	Monitor

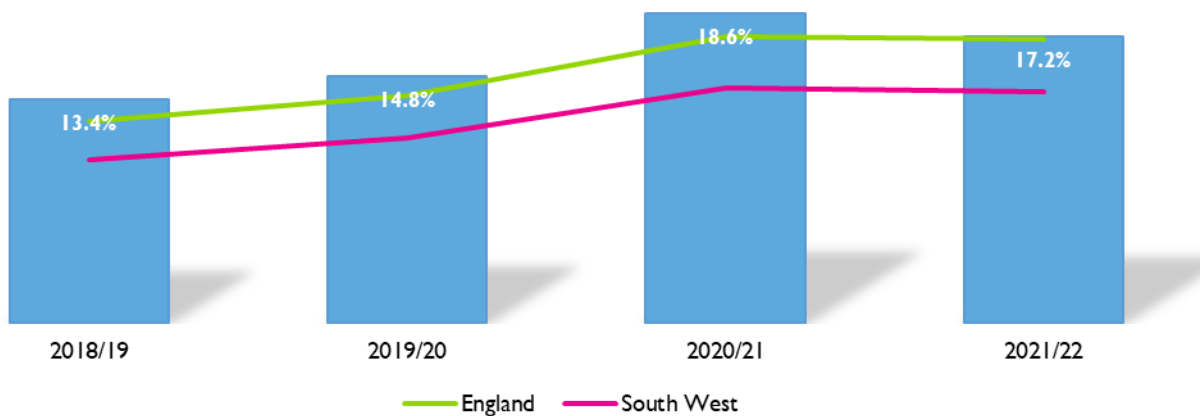
Percentage of people accessing the Stop Smoking Service who have quit



Excess weight in 10-11 year olds



Eligible pupils taking benefit based FSM as a percentage of the whole pupil population



Plymouth's Stop Smoking support service is now offering a range of options, including face to face engagement as well as telephone based support. The majority of clients continue to opt for telephone support. Smoking cessation remains a priority through delivery of our specialist services due to the importance of respiratory health but the number of people supported has dropped, principally due to a drop in GP provision. The local Specialist Stop Smoking team continues to encourage referrals in to their service and we are continuing our strategy of focusing the range of resources towards those with the greatest and most complex needs by targeting a range of support options for vulnerable groups.

There was no National Child Measurement Programme (NCMP) undertaken across all primary schools nationally in the academic year 2020/2021 due to COVID-19. The last complete NCMP data that we have is for 2019/20. However, eight Plymouth schools contributed to a national representative sample of schools during 2020/21 and statistical weighting was applied to the data to produce an estimate of obesity prevalence and key findings at a national level. In Year Reception, obesity prevalence had increased from 9.9% in 2019/20 to 14.4% in 2020/21. In Year 6, obesity prevalence increased from 21.0% in 2019/20 to 25.5% in 2020/21. The data also illustrates that clear health inequalities exist. With regards to gender, boys have a higher obesity prevalence than girls at both Year Reception and Year 6. Additionally, 20.3% of Year Reception children living in the most deprived areas were obese compared to 7.8% of those living in the least deprived areas, while 33.8% of Year 6 children living in the most deprived areas were obese compared to 14.3% of those living in the least deprived areas. Performance presented in this report uses excess weight as the measure, which is the combination of the percentage measured as being obese added to the percentage measured as being overweight. By contrast, the examples above are based on the percentage measured as obese only. The representative sample finding for 2020/21 was that for Year Reception, the national figure was 27.7% (up from 22.6% in 2019/20) and for Year 6 the national figure was 40.9% (up from 33.5% in 2019/20). The NCMP for 2021/22 has now been completed by the School Nursing Service and we would expect data for Plymouth to be available in October/November 2022. A new Tier 3 Children and Young People's weight management service (pilot until 2024), commissioned by NHS England and based at University Hospitals Plymouth, is now working with children and young people who have complex medical needs linked to excess weight. Work on completing a system wide 'action plan' is in progress and is on track to be completed during quarter two 2022/23. Work continues via children's centres, education settings, health professionals, and the voluntary and community sector to support healthy weight through information, advice and support.

The proportion of pupils eligible for Free School Meals (FSM) as a percentage of the whole pupil population increased to 24.8% in 2021/22 (up from 23.1% in 2020/21). However, we also know that the proportion of eligible pupils who did not claim them grew in 2021/22. Work to address this gap and awareness of eligibility for Universal Infant Free School Meals (UIFSM) is being undertaken with schools for the new academic year. It is important to note that since UIFSM is a universal provision, in theory, these families are not identified as being in need or eligible for FSM but it is vital that families are able to check eligibility for FSM since this brings with it essential Pupil Premium budget to schools. With the current cost of living crisis it will be even more important to ensure that all families currently eligible for FSM have the opportunity to claim/access them if their circumstances change. In quarter one of 2022/23, the take-up of FSM has seen an increase but has some way to go to return to pre-pandemic levels. Paid meals have increased and are close to pre-pandemic levels; however, we are mindful that the current cost of living crisis might be beginning to have an impact on these numbers. All figures could still have been impacted by unknown levels of pupil absences due to COVID-19. It is hoped that quarter two will continue to show these upward trends.

6. School readiness

We are waiting for the Department for Education to publish the 2022 data; however, locally sourced data will be ready in autumn 2022.

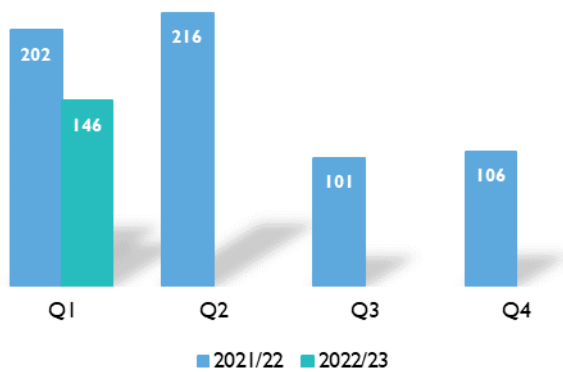
The Early Years Strategic Board (EYSB) is now established and its plan outlines our collective ambition to improve the key outcomes for children, especially the most vulnerable. There are three strands to the plan:

1. Every child attends a good setting
2. Children are ready for school
3. Disadvantage and inclusion.

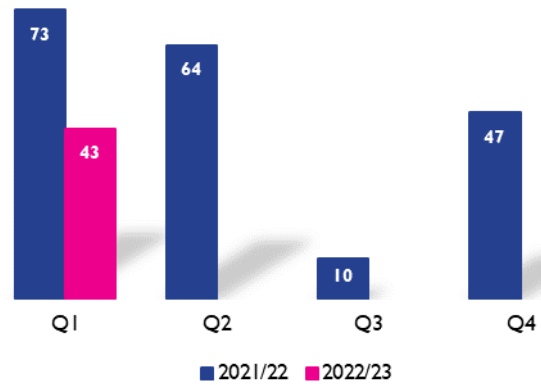
The actions are being delivered in a multi-disciplinary way, with education (the early years and childcare team, settings and schools), health (including public health), and social care taking lead roles. Performance measures are currently being agreed and will be ratified at the next EYSB meeting in September 2022.

Quarterly KPI	Q2 2021/22	Q3 2021/22	Q4 2021/22	Q1 2022/23	Direction of travel	Target
7. Anti-social behaviour incidents reported to the council	216	101	106	146	▲	Monitor
8. Number of early interventions to anti-social behaviour	64	10	47	43	▼	Monitor
Plymouth City Survey (2020 collected pre-pandemic)	2012	2014	2018	2020	Direction of travel	Target
9. Residents who feel safe (during the day)	89%	88%	91%	90%	▼	Trend increase

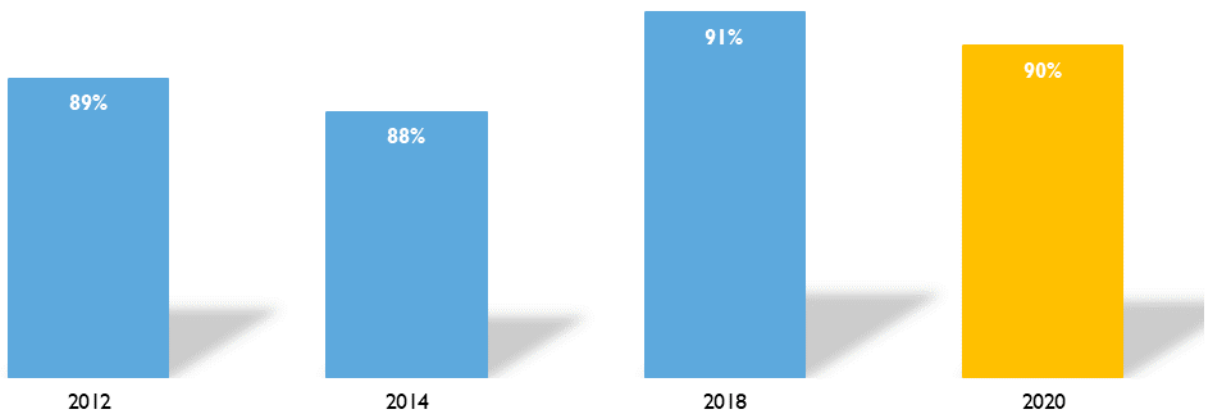
Number of anti-social behaviour incidents reported to the council



Number of early interventions to anti-social behaviour



Percentage of Plymouth City Survey respondents who feel safe outside in their local area



In quarter one, we received 146 anti-social behaviour (ASB) reports directly into the council via our online reporting form, which is used by the public and our Community Connections Advisors when taking telephone queries. In addition to this, we received a number of reports and requests for service from our police and housing partners. The number of ASB reports received by Community Connections is higher than the number received in quarter four but is 27% less than in quarter one 2021/22. It is expected that reports of anti-social behaviour increase as the weather gets warmer and evenings lighter as people spend more time outside. In quarter one, four requests for ASB Case Reviews/Community Triggers were received, all of which met the required threshold.

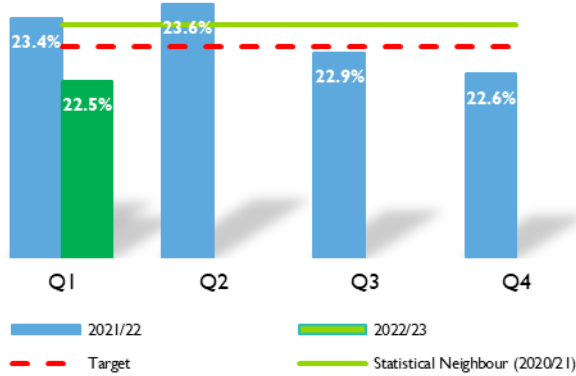
Community Connections works collaboratively alongside partner agencies, including Devon and Cornwall Police, to maximise opportunities for early intervention of ASB. It is universally recognised that by intervening at an earlier stage, ASB can often be prevented from escalating and therefore can be resolved more effectively. In quarter one, 11 ASBI warnings were issued to young people, under the age of 18, including group-related ASB within the Efford/Lipson area; 21 ASBI warnings were issued to adults over the age of 18, including several for alcohol-related ASB in the city centre and Devonport area; and six Community Protection Notice Warnings (CPNW) were issued where earlier attempts at intervention had not been successful, including a CPNW served on a private landlord for failing to manage anti-social behaviour associated with tenants of their properties.

In 2020, 90% of residents who completed the Plymouth City Survey felt safe outside in their local area during the day, with only 3% feeling either fairly or very unsafe. Safer Plymouth has developed to become a trauma informed community safety partnership. A proposal was developed in conjunction with the Trauma Informed Plymouth Network to refresh the identity of the partnership and to improve efficiency and flexibility in how we operate through new governance arrangements. This has proved to be effective, in particular in the readiness to deliver against the new duties on the local authority brought about by the new Domestic Abuse Act and in readiness for the future delivery of the Serious Violence Bill.

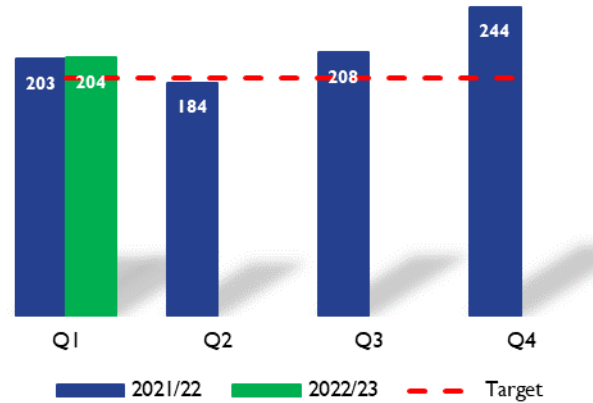
Focus on prevention and early intervention

Quarterly KPIs	Q2 2021/22	Q3 2021/22	Q4 2021/22	Q1 2022/23	Direction of travel	Target
10. Repeat referrals to Children's Social Care	23.6%	22.9%	22.6%	22.5%	▼	23.0%
11. Households prevented from becoming homeless or relieved of homelessness	184	208	244	204	▼	188
12. Number of people rough sleeping	12	8	9	15	▲	Monitor
13. Long-term support needs met by admission to residential and nursing care homes (65+)	56	67	52	69	▲	Monitor

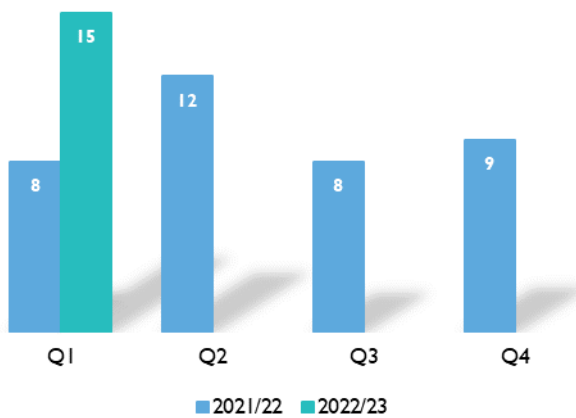
Repeat referrals to Children's Social Care



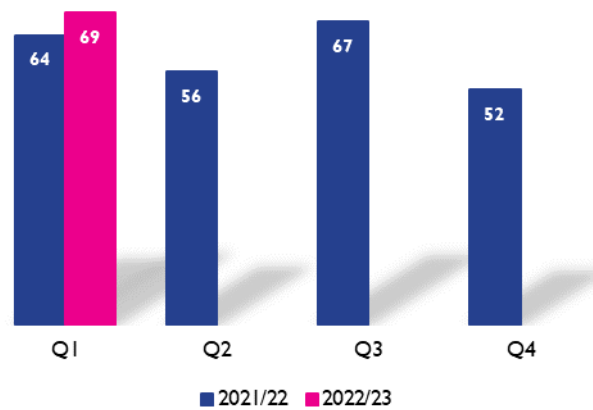
Number of households prevented from becoming homeless or relieved of homelessness



Number of people rough sleeping



Long-term support needs met by admission to residential and nursing care homes (65+)



At the end of quarter one, the percentage of re-referrals over a rolling 12 month period was 22.5%, equating to 631 of the 2,806 referrals received in the last 12 months being for children and young people who we had already received a referral for during the 12 months prior. This has reduced from quarter four, when 113 (24.3%) of the 466 referrals received were repeat referrals. We are currently at a better level than our statistical neighbours (23.3% for 2020/21) and comparable with the England average (22.7%).

During quarter one, 204 households were prevented from becoming homeless or relieved of their homelessness. However, there were some applications received late in the quarter that might progress to a prevention. The service achieved the annual target of 750 in 2021/22 and has achieved the target of 188 per quarter in quarter one of 2022/23. Pressures around homelessness and numbers in temporary accommodation remain. The Homelessness Prevention Partnership Executive continues to oversee the delivery of a single, structured and integrated multi-agency programme of work, with the aim of reducing and preventing homelessness in Plymouth.

The value for rough sleeping is based on the average of a one day snapshot reported each week during the period. On average during quarter one, 15 people were seen rough sleeping each week. The number of rough sleepers is now consistently higher than was recorded over the colder months during quarters three and four of 2021/22.

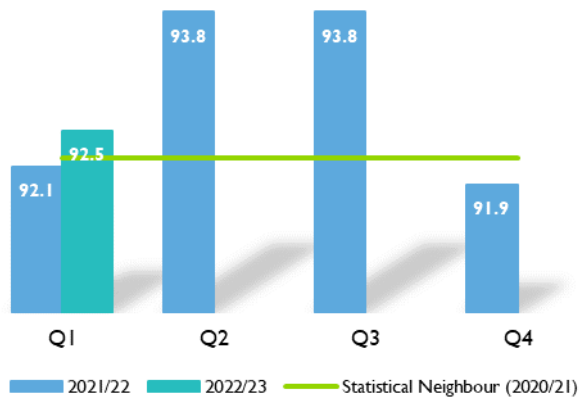
Over a sustained period the number of people admitted into a residential or nursing care home has been on a static trajectory. In May 2022, the number of people aged 65 and over increased to 32, which is the highest monthly number for more than two years and is well above the monthly average over the last two years (20). The admission figures for June show a drop back to 19. The admissions to nursing care have increased over the past two months.

Keep children, young people and adults protected

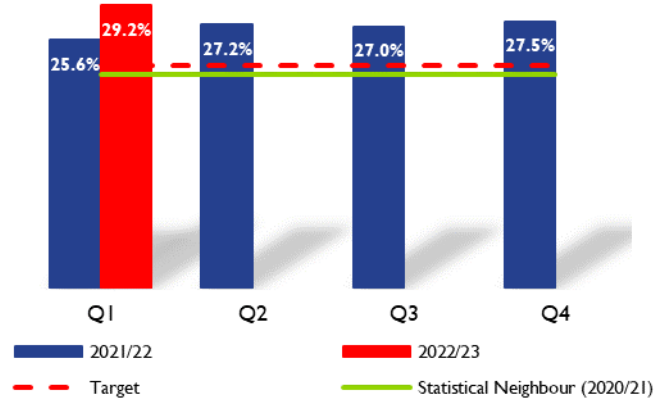
Quarterly KPIs	Q2 2021/22	Q3 2021/22	Q4 2021/22	Q1 2022/23	Direction of travel	Target
14. Children in care (rate per 10,000)	93.8	93.8	91.9	92.5	▲	Monitor
15. Children with multiple child protection plans (rolling 12 months)	27.2%	27.0%	27.5%	29.2%	▲	23.0%
16. Closed adult safeguarding enquiries with desired outcomes fully/partially achieved	94.4%	98.6%	92.5%	95.3%	▲	94.5%

Annual KPI	2017/18	2018/19	2019/20	2021/22	Direction of travel	Target
17. Adult social care service users who feel safe and secure	90.1%	89.8%	90.0%	87.9%	▼	90.0%

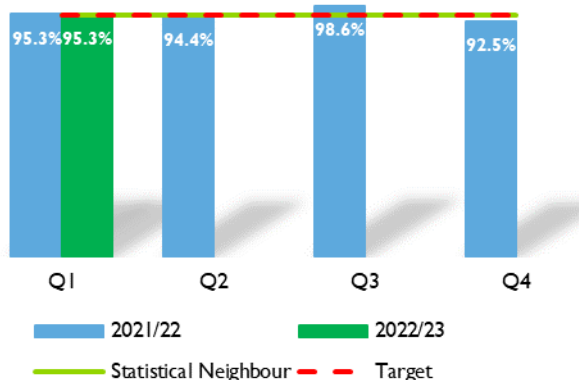
Number of children in care (rate per 10,000 children)



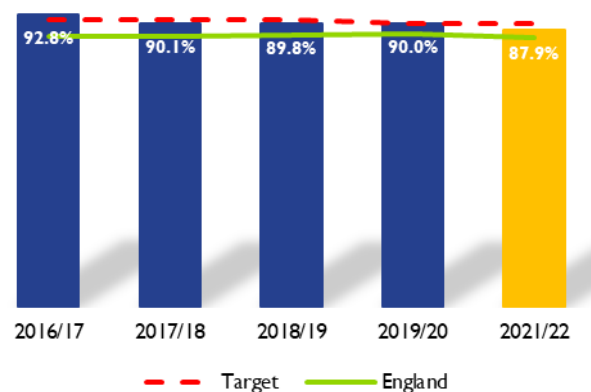
Percentage of children subject to multiple child protection plans (rolling 12 months)



Percentage of closed adult safeguarding enquiries where the desired outcomes have been fully or partially achieved



Percentage of ASC service users who say that those services make them feel safe and secure



The number of looked after children saw a net increase of three children/young people on quarter four to 493 children. This is a net increase of 61 children since the first national lockdown started on 23 March 2020. However, the number/rate of children in care has plateaued at an average of 492 since March 2021 and we have not continued to see any ongoing increase as experienced prior to and during the pandemic. Our rate per 10,000 children is currently 92.5, which is slightly higher than our statistical neighbour average (published at 92.2r for 2020/21) and 25.5 children per 10,000 more than the England average. We are working to improve our edge of care response for children, including adolescents, as well as offering intensive support for children to be reunited with their immediate or extended family network where this is in their best interests.

In the 12 months up to the end of quarter one 2022/23, 103 (29.2%) of 353 new Child Protection Plans were for children who had already been on a Child Protection Plan at some point in their lifetime. Whilst this is an increase of 1.7 percentage points on the previous quarter, there were seven less children starting a repeat plan compared to the 110 reported for the 12 months at the end of quarter four. Within quarter one, 14 (25.0%) of the 56 new Child Protection Plans were repeat Plans. A review of all repeat Child Protection Plans in quarter four highlighted actions required to address this challenge, such as an increase in the management oversight in decisions to progress to Initial Child Protection Conferences. The overall number of Child Protection Plans is reducing, as is the number of new Child Protection Plans. The number of those starting a repeat Child Protection Plan is also reducing but not at the same rate, leading to an increased proportion of repeat Child Protection Plans. This is being closely monitored by the service, including case audit to understand why repeat planning is being requested.

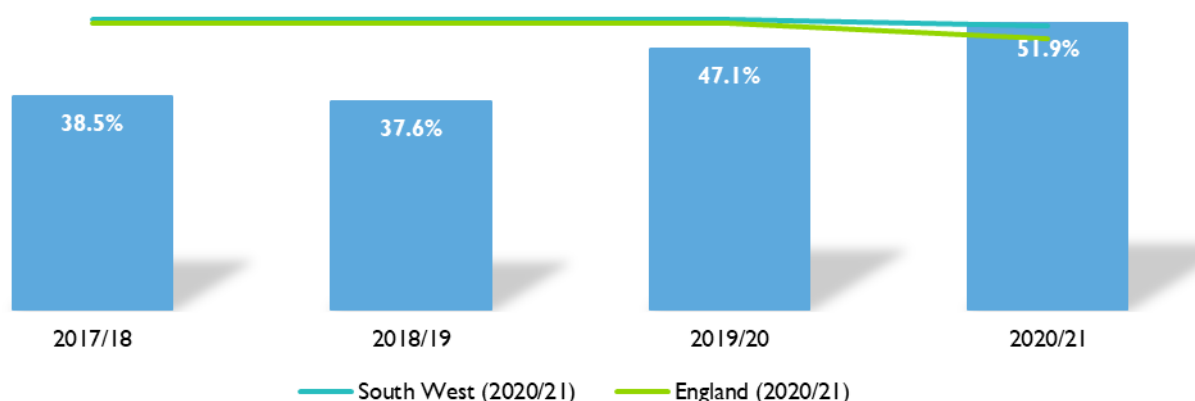
Between 1 April and 30 June 2022, 139 individuals were the subject of a completed safeguarding enquiry, 107 of whom expressed a desired outcome at the start of the enquiry (77% compared to 66% in quarter four 2021/22). The percentage of people who were not asked about their preferred outcome decreased to 14% (19), which is a considerable improvement on the 22% last quarter. The percentage of enquiries with outcomes that have been either fully or partially achieved increased in quarter one to 95.3% (102), compared with 92.5% in quarter four.

No annual Statutory Adult Social Care (ASC) Survey was carried out in 2020/21 due to COVID-19. The 2021/22 survey shows a slight decline in feelings of safety, both locally and nationally. In Plymouth, 87.9% of people stated that services made them feel safe and secure, which is higher than the national average of 85.4%.

Improved schools where pupils achieve better outcomes

Quarterly KPIs	Q2 2021/22	Q3 2021/22	Q4 2021/22	Q1 2022/23	Direction of travel	Target
18. Percentage of early years settings judged by Ofsted as good or outstanding	No data	97.0%	97.0%	97.6%	▲	Monitor
19. Percentage of pupils attending schools judged by Ofsted as good or outstanding	No data	71.1%	77.1%	78.6%	▲	Monitor
Annual KPI	2017/18	2018/19	2019/20	2020/21	Direction of travel	Target
20. Percentage of Key Stage 4 pupils achieving the Basics (5+ in English and Maths)	38.5%	37.6%	47.1%	51.9%	▲	Monitor

Percentage of Key Stage 4 pupils achieving the Basics



The Early Years Team works to ensure that all children attend high quality settings, especially the most vulnerable children. The team is currently working with two settings that have been judged as 'requires Improvement'. In addition, they are working with other settings that have vulnerabilities due to leadership issues, new staff, turnover of staff, etc. To date, this method of working has resulted in a 100% success rate and, on the whole, settings have welcomed the support offered. A 'Recruitment and Retention Focus Group' has been established and has started to plan a strategic approach to the current recruitment and retention crisis within this sector. Actions include the attendance at appropriate employment events and promotional content for future events. As recruitment and retention is an issue across the UK, we are working alongside other local authorities, Hempsall's and the Department for Education. Childcare places remain sufficient city wide. However, we continue to monitor childcare sufficiency and the changing patterns that have emerged since the pandemic, including reduced places/provision and parents using less childcare due to increased flexibility with working from home. A revised sufficiency audit is currently in progress.

Graded inspections resumed at the start of the 2021/22 academic year. There are 98 state-funded schools in the city and, at the end of quarter one, 78.6% of pupils are attending a school judged as good or outstanding. At the end of quarter one, 87.6% of primary school pupils are attending schools rated as good or better, which is up from 85.2% in quarter four, while 66.8% of secondary school pupils are attending schools that are rated as good or better, which is down on quarter four by 2.1 percentage points; however, it is important to note that this decrease is due to a change in pupil population rather than a change in Ofsted ratings. The phase improvement partnerships, including Early Years, Primary/Special, and Plymouth Strategic (Secondary) Education Group, continue to provide momentum for the place based approach for secondary school improvements, reporting directly to the Plymouth Education Board and the Regional Schools Commissioner.

Due to the COVID-19 pandemic, all summer 2021 exams were cancelled. This attainment data reflects the GCSE grades awarded to pupils in August 2021 through centre (school based) assessed grades. As a result, the 2019/20 and 2020/21 data should not be directly compared to attainment data from previous years for the purposes of measuring changes in student performance. The percentage of pupils achieving the 'basics' (5+ in English and Maths) is 51.9% and now sits above the recently validated and published national and statistical neighbour averages, although slightly below the regional average. The strengthened education improvement partnerships continue to provide momentum for the place based approach for secondary school improvements, reporting directly to the Plymouth Education Board and the Regional Schools Commissioner. The 2021/22 results are due to be verified in October and will then be published (provisional figures are expected in August).

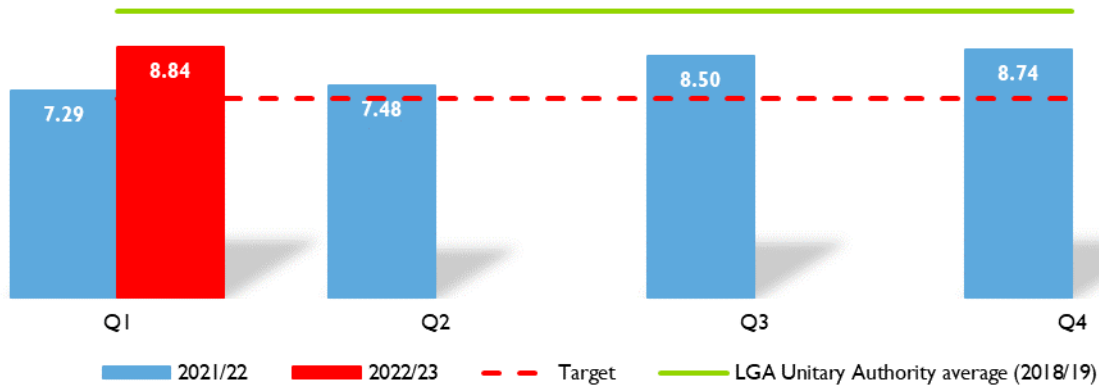
Delivering on our commitments

- ***Empowering our people to deliver***
- ***Providing a quality service to get the basics right first time***
- ***Engaging with and listening to our residents, businesses and communities***
- ***Providing value for money***
- ***Championing Plymouth regionally and nationally***

I. FTE days lost due to staff sickness (rolling 12 months)

Financial year	Q1	Q2	Q3	Q4	Direction of travel	Target
2021/22	7.29	7.48	8.50	8.74		7.00
2022/23	8.84				▲	7.00

Number of FTE working days lost due to staff sickness (rolling 12 months)



The number of days lost per full time equivalent (FTE) for the council as a whole increased to 8.84 days at the end of quarter one (up 0.10 days from quarter four of 2021/22), and is nearly two days above the corporate target of 7.0 days per FTE. When compared against the same quarter of 2021/22, the number of days lost is currently 1.55 days higher. These figures are inclusive of COVID-19 sickness. The top five reasons for short term sickness absence are:

1. Cold/flu
2. COVID-19
3. Stomach/gastric/liver
4. Other musculoskeletal (excluding back and neck)
5. Anxiety/depression/psychological - personal.

The top long term sickness absence reasons are:

1. Anxiety/depression/psychological - work
2. Stress – personal
3. Other musculoskeletal (excluding back and neck)
4. Surgery/operation (if cause not listed)
5. Back and/or neck problems.

In total, 1,214 employees had a short term absence and 220 had a long term absence in the rolling 12 months to 30 June 2022.

An action plan is in place to further support managing sickness absence, which includes:

- A review of the Managing Attendance Policy and procedures
- Proactive management of all cases, ensuring that manager training needs are met, inclusive of refresher training
- Commissioning of training for managers and team leaders.

2. Staff engagement

We are always keen to engage with, and motivate, employees to contribute to the continuous improvement of the organisation. It is equally important that employees know that their ideas and thoughts are valued. Our People Strategy demonstrates that we are committed to doing the best for our residents, and the four threads very much contribute to the positive engagement of our workforce:

- Everyone feels welcome
- Aspire to be the best
- Attract and keep the right people
- Be well led.

Employee engagement occurs daily on both a formal and informal basis across the council. It encompasses the employee life cycle, starting with on boarding (introduction to the organisation and role) and induction, and concluding with exit interviews. Employees will experience:

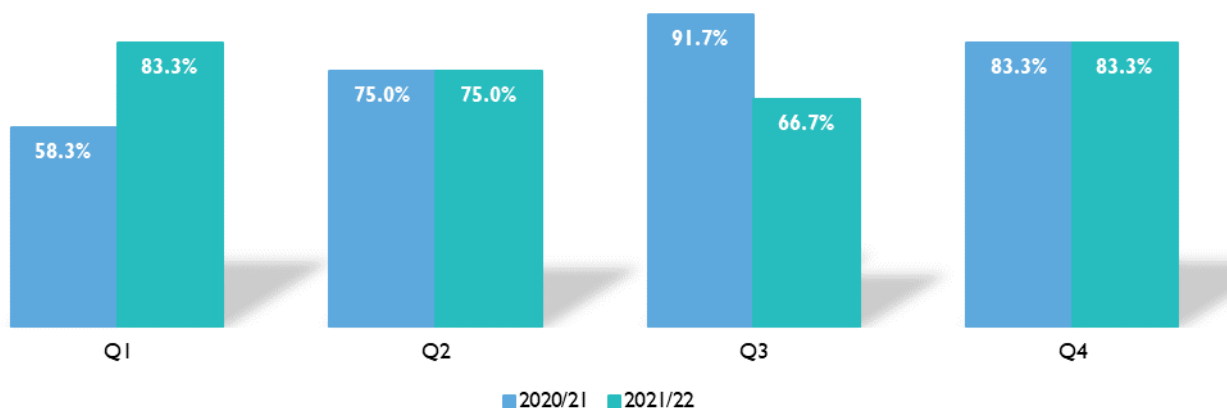
- Informal and formal consultation - when any changes are proposed during service reviews or restructures, engagement/consultation will take place
- Employee forums - focus groups/forums are made up of a diagonally-sliced cross section of the workforce and used to gather thoughts, ideas and concerns from a broad spectrum of employees about potential changes
- Surveys - The Big Listen is the annual engagement survey and opened during quarter one in June 2022
- Question and answer sessions chaired by the Chief Executive
- Tea with Tracey/Talk with Tracey (Chief Executive) - these have focused on employees from the protected characteristics, including age (apprenticeship week), gender, ethnicity, faith, LGBTQ, and disability. The most recent one has been open to all women in the council
- Employee Networks - these are now in place for women, men, LGBTQ, and disabilities, with more planned
- Tracey’s Team Talk - monthly update is made available to all employees and is also shared with non-PC users via team meetings or huddles
- Huddles/team meetings/toolbox talks
- Employee representative Champions - Green and Wellbeing
- Engagement with senior managers - ‘back to the floor’ and site visits.

Providing a quality service to get the basics right first time

3. Customer experience score

Financial year	Q1	Q2	Q3	Q4	Direction of travel	Target
2020/21	58.3%	75.0%	91.7%	83.3%		
2021/22	83.3%	75.0%	66.7%	83.3%	▲	Monitor

Customer experience score



The customer experience score is an index KPI that takes into account performance against a number of indicators that are focused on the customer. Currently, this indicator considers customer complaints resolved in expected timescales; Freedom of Information (FOI) requests completed within 20 working days; the time taken to process new claims for Housing Benefit and Council Tax Support; percentage of bins reported as missed by customers; and the number of households prevented from or relieved of homelessness. Two points are allocated when an indicator is achieving target, one for a KPI that is amber against target (within 15%) and none for a KPI that is red against target (more than 15% away). The score is then represented as a percentage of the maximum score possible. This measure is currently under review and will be updated in the quarter two 2022/23 report. The below narrative refers to quarter four 2021/22 performance.

81.0% of stage one complaints resolved in quarter four were resolved within the timeframe of 10 working days. This is an improvement on quarter three, in which we achieved 78.3%, but remains below the 90% target due to a focus on resolving older out of time complaints within the quarter. For 2021/22 as a whole, we resolved 85.0% of our complaints within 10 working days, which is slightly below 2020/21 (88.8%). We will continue to work on improving our response time to customer feedback. Of the complaints resolved within quarter four, 30.5% were upheld, which remains lower than the upheld rate that we saw last year (32.1%) but slightly above the total upheld rate for 2021/22 (29.6%). The number of complaints received in quarter four 2021/22 (1,374) decreased when compared with quarter three (1,853), while we also received fewer compliments in quarter four (106) than in quarter three (112).

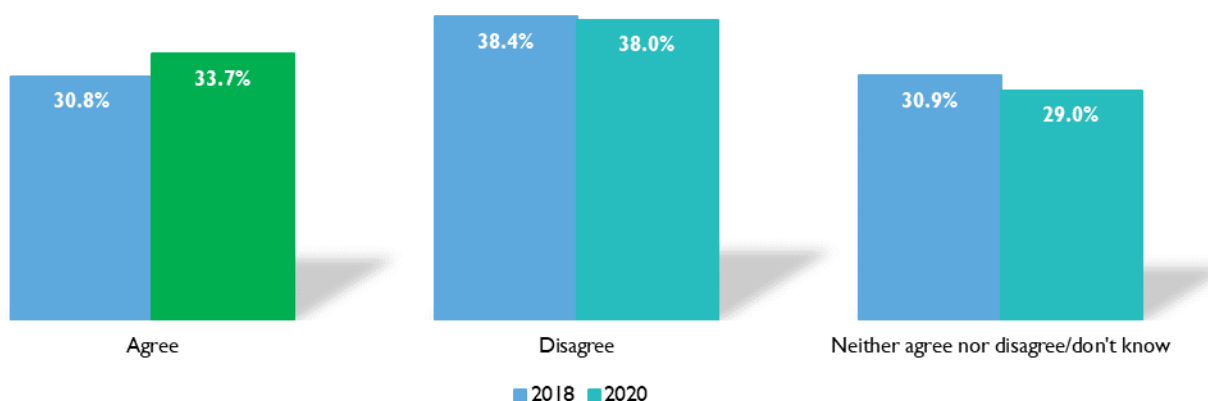
We were due to complete 253 Freedom of Information (FOI) requests in quarter four 2021/22, 230 of which were completed within the timeframe of 20 working days, equating to 90.9% and exceeding the target (90%). This is a small increase in both the number of requests due and timeliness from quarter three (250 FOIs due in quarter three; 90.0% completed on time). Throughout 2021/22, we completed 883 of the 976 FOI requests that were due within 20 working days, equating to 90.5% and achieving our target for the year.

The average time taken to process new Housing Benefit claims improved in quarter four 2021/22 to 17.5 days, against a target of 18 days. The average time taken to process new Council Tax Support claims also improved in quarter four to 19.3 days, although remains above the target of 18 days. The improvement in processing times was the result of an operational decision to prioritise Housing Benefit and Council Tax Support new claims prior to the end of year process to recalculate awards for the new financial year. Additionally, resource that was previously allocated to administering the Test and Trace Support Payment scheme, which ended on 28 February, has now returned to processing claims and has helped to reduce the processing times for Housing Benefit and Council Tax Support.

Engaging with and listening to our residents, businesses and communities

Plymouth City Survey	2018	2020	Direction of travel	Target
4. Residents who know how to get involved in local decisions	30.8%	33.7%	▲	Trend increase

Percentage of Plymouth City Survey respondents who know how to get involved in decisions affecting their local area

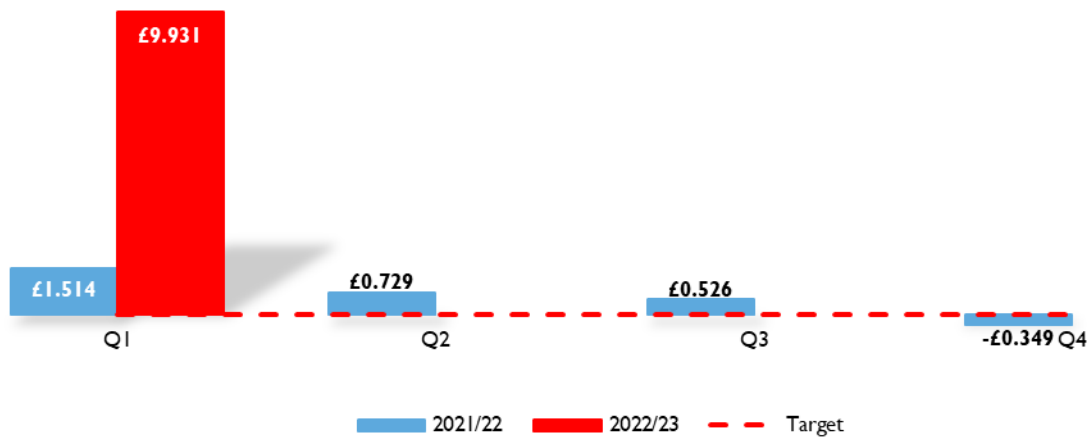


These results tell us that a third (33.7%) of respondents are aware of how they can get involved in decisions in their local area. For the second successive survey, the youngest age group was significantly less likely to agree that they know how to get involved, with 7.5% of respondents aged 16 to 24 years agreeing compared with 34.9% of those aged 25 years and older. Councillors have different ways of engaging with residents in their wards, meaning that residents have direct access to their elected representatives and the council has an established mechanism for consulting on proposals, such as planning applications. A public engagement exercise to support the 2022/23 budget setting process took place in November 2021, where 1,200 residents were able to tell us about which public services were important to them and give their views on proposals for achieving a balanced budget.

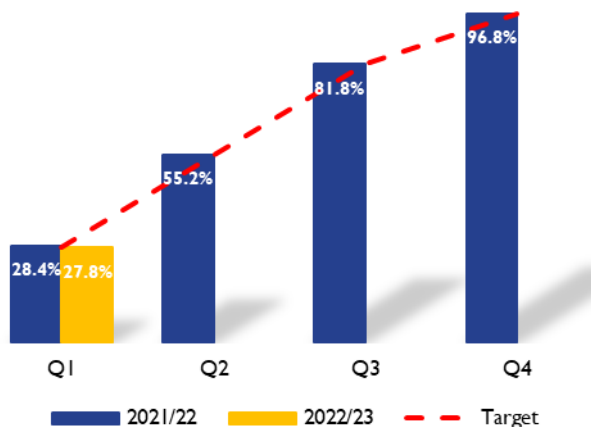
Providing value for money

Quarterly KPIs	Q2 2021/22	Q3 2021/22	Q4 2021/22	Q1 2022/23	Direction of travel	Target
5. Spend against budget	£0.729m	£0.526m	-£0.349m	£9.931m	▲	£0.000m
6. Council tax collected (YTD)	55.2%	81.8%	96.8%	27.8%	▼	28.2%
7. Business rates collected (YTD)	51.6%	77.2%	98.7%	35.4%	▼	30.0%

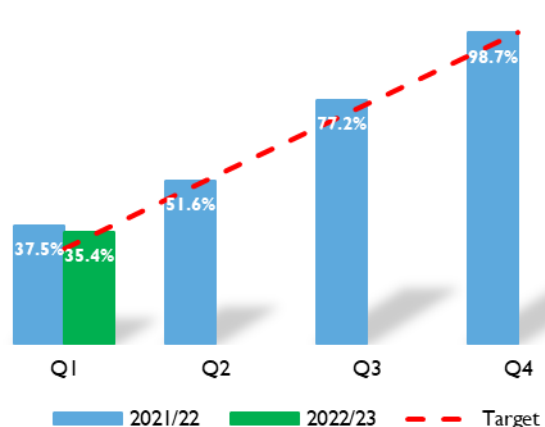
Forecast year end variation spend against budget (£million)



Percentage of council tax collected (YTD)



Percentage of National Non-Domestic Rates (NDR) collected (YTD)



The forecast revenue outturn after the application of COVID-19 grants and council mitigating actions is currently estimated at £9.931 million over budget, which is a variance of approximately 1.9% against the council's overall budget forecast. This variance is considerably higher than we would expect at this point of the financial year and includes around £7 million of non-controllable costs, largely due to a number of unprecedented pressures caused by global economic and political factors, as well as the ongoing impact of the pandemic on demand and costs, which could not have been foreseen at the time of setting the Budget. This is the provisional end of year position for 2022/23. It is still early in the reporting cycle so it should be noted that the financial position will change as we move through the year. Officers and Members will work closely to manage the finances towards a balanced position by the end of the year. Given the value of the forecast overspend, it is inevitable that further decisive interventions will be needed to constrain expenditure and to successfully manage the position.

27.84% of council tax had been collected by the end of quarter one 2022/23, which is below the target of 28.15% and the proportion collected by the end of quarter one 2021/22 (28.35%). In total, £42.099 million was collected in quarter one 2022/23. We have seen a greater number of reminder notices being issued this quarter, which is a sign of the rising cost of living. Some customers may have also been withholding payment while they waited for the £150 energy rebate payment; payment of the energy rebate has commenced and by the end of June more than 85,000 customers had been paid.

35.44% of business rates had been collected by the end of quarter one 2022/23, equating to £31.047 million. This is above the year to date target of 30.0% but below the total collected by the same period last year (37.48%). However, unlike last year, retail and leisure properties have had to pay rates from April at 50%. There are also a number of credits held against 2021/22 rates bills following an award of relief in March. These credits will be rolled forward to July 2022/23.

Championing Plymouth regionally and nationally

8. Offers and Asks

A refresh of our public affairs activity is underway in light of the new Administration's priorities for delivery, which include:

- creating higher value jobs
- delivering good quality, green homes
- ensuring decent education
- access to first class health care.

Over the last quarter we have continued to engage with Ministers and senior civil servants on the issues that are important to Plymouth. In particular, we have focused on levelling up and developing relationships with government departments to drive forward the next stage of Plymouth's regeneration. This has included correspondence with the Secretary of State for Levelling Up, Housing and Communities; the Minister for Levelling Up; and the Director General, Regeneration, Department for Levelling Up, Housing and Communities (DLUHC); as well as meeting with the Director of Regeneration and Housing Delivery, DLUHC. The city also welcomed the Minister for Employment at the Department for Work and Pensions (DWP) to the Skills Launchpad Plymouth, to find out more about our innovative collaboration with the DWP and Plymouth Job Centres to support local people into work and to progress.

9. Regional influence

Negotiations with the Government are expected to commence during the autumn on a Devolution Deal for Devon, Plymouth and Torbay. This would involve the area being granted increased powers, as well as direct control over more of the public funding that is spent in the area on things like skills, housing and transport. Alongside the Deal, a new statutory partnership between the three councils will need to be established in the form of a Combined County Authority to manage the new functions devolved from government. Work is currently underway to develop the operational detail under the Devolution Deal asks as preparation to engage with government officials.

The Heart of the South West Joint Committee will continue to meet until at least April 2023, but less frequently. It will provide a forum for the Leaders from all of the councils across Devon, Somerset, Plymouth and Torbay, and the Local Enterprise Partnership. The forum will provide updates on the transition towards a Devolution Deal, the formation of the new unitary council in Somerset, and the changing role of Local Enterprise Partnerships.

Description of key performance indicators

UNLOCKING THE CITY'S POTENTIAL

Priority	Key performance indicators	Description
A clean and tidy city	1. Streets graded at an acceptable level for overall street cleanliness and grounds maintenance	The cleanliness and condition of streets is measured using the Land Audit Management System (LAMS), so that we can compare ourselves to other members of the Association for Public Service Excellence (APSE) performance network. It comprises three main elements: street cleanliness, grounds maintenance, and the presence of hard surface weeds. Results are cumulative and include all audits that have been completed in the financial year to date.
	2. Household waste sent for recycling, reuse or composting	The amount of household waste that is recycled, reused or composted, including IBA metals.
A green, sustainable city that cares about the environment	3. Average cycle trips taken on DfT count day	The Department for Transport (DfT) undertakes one day cycle counts on approximately 40 roads across the city, once a year, every year. The data is collected and published annually. This dataset provides a reasonably consistent annual snap shot of levels of on road cycling in the city that can be used as an indicator of the extent of growth in the use of sustainable transport. The Government's 2017 Cycling and Walking Strategy target is to double cycling by 2025.
	4. Carbon emissions emitted by the council	The amount of carbon dioxide (CO ₂) emissions emitted by the council (narrative update on the Corporate Carbon Reduction Plan).
Offer a wide range of homes	5. Net additional homes delivered in the city (cumulative from 2014/15)	The annual net additional homes in the Plymouth Local Planning Authority Area, for example through new house building completions and conversions (e.g. of a house into flats), but after the removal of dwellings lost by change of use or demolition.
A vibrant economy, developing quality jobs and skills	6. Spend on small and medium enterprises	The council's spend on supplies, services and works from small and medium-size enterprises/businesses (SMEs) as a percentage of the total amount spent. This is the council's spend through the Procurement Service including spend for other commissioned providers, such as care services. This indicator shows the year to date position at the end of each quarter, aligning with the annual target.
	7. Spend within the PL postcode	The council's spend on supplies, services and works from businesses with a PL postcode as a percentage of the total amount spent. This is the council's spend through the Procurement Service including spend for other commissioned providers, such as care services. This indicator shows the year to date position at the end of each quarter, aligning with the annual target.
	8. 16-18 year olds in education, employment or training	The percentage of young people aged 16 to 18 in academic years 12 to 14 who are going to, or remaining in, education, employment or training (EET).
	9. Employment rate (16-64 population, rolling 12 months)	This includes anyone aged 16 to 64 years who did some paid work in the reference period, whether as an employee or self-employed; had a job that they were temporarily away from; on government-supported training and employment programmes; or were doing some unpaid family work.
	10. Number of businesses supported through COVID-19 business grants	The way that businesses have been supported has been directly impacted by COVID-19. This indicator will now focus on the businesses supported through the COVID-19 business grants and will likely be reviewed each year.

	11. Inward investment	The total value of strategic projects, third party investments and notable Foreign Direct Investments (FDIs) brought into the city or facilitated by the council.
	12. Inclusive growth (earnings gap)	The gap in gross weekly pay between the top 20% and the bottom 20% of earners within Plymouth.
An exciting, cultural and creative place	13. Number of visitors to Plymouth	A visitor is defined as someone who lives more than an hour from a destination or who stays overnight. Data is supplied by the South West Tourism Research Company and is based on the Cambridge Economic Impact Model, which is an industry respected tool for measuring the economic impact of tourism in a given area.
Create a varied, efficient, sustainable transport network	14. Principal roads (A) in good or acceptable condition	The condition of principal roads (A roads) in the city, collected via a mechanical condition survey.
	15. Public satisfaction with traffic flow	Public satisfaction with traffic levels and congestion on Plymouth's roads, collected via the National Highways and Transport (NHT) Network annual survey.
	16. Carriageway defects completed on time	A combined score for the timeliness of completing priority one (24 hours), priority two (seven days) and priority three (21 days) carriageway defects. This includes works related to the surface of the carriageway (i.e. not footpaths, gullies, etc.) and excludes any defects that have had an issue on site or have a valid reason for missing the deadline.

UNLOCKING THE CITY'S POTENTIAL

Priority	Key performance indicators	Description
A friendly, welcoming city	1. Residents who think people from different backgrounds get on well together	The percentage of Plymouth City Survey respondents who agreed with the statement 'my local area is a place where people from different backgrounds get on well together'. This is a measure of community cohesion.
	2. Residents who regularly do voluntary work	The percentage of Plymouth City Survey respondents who volunteer or help out in the city, which includes formal volunteering (e.g. for a charity or community group) or informal helping out (e.g. a neighbour).
Reduced health inequalities	3. Stop smoking service successful quit attempts	The number of people who engage with the Stop Smoking Service and set a quit date, with successful quit attempts measured at four weeks.
	4. Excess weight in 10-11 year olds	The prevalence of excess weight (including obesity) among children in Year 6 (aged 10 to 11 years old).
	5. Eligible pupils taking benefit based Free School Meals (FSM) as a percentage of whole population	Families who are entitled to one of the following benefits are eligible to access Free School Meals: Income Support; income-based Jobseeker's Allowance; income-related Employment and Support Allowance; support under Part VI of the Immigration and Asylum Act 1999; guaranteed element of Pension Credit; Working Tax Credit; or Universal Credit. This indicator measures the number of pupils who are taking up their eligibility.
	6. School readiness	The percentage of Early Years Foundation Stage Profile (EYFSP) pupils in the city who achieve a Good Level of Development (GLD) at the end of each academic year. Due to the suspension of the publication of attainment data as a result of COVID-19, this is a narrative update on progress.
People feel safe in Plymouth	7. Number of anti-social behaviour incidents reported to the council	A demand measure that reports on the number of anti-social behaviour reports to the council via our online reporting form, which is used by the public and our Community Connections advisors who take telephone queries.

	8. Number of anti-social behaviour interventions	The number of early interventions issued by the Anti-Social Behaviour Team to help prevent an escalation in offending. Early interventions include ASB1 letters; ASB2 letters; Acceptable Behaviour Contracts; referrals to IMPACT (youth diversionary programme); and Community Protection Notice Warnings.
	9. Residents who feel safe (during the day)	The percentage of Plymouth City Survey respondents who feel fairly safe or very safe when outside in their local area during the day.
Focus on prevention and early intervention	10. Repeat referrals to Children's Social Care	The percentage of referrals to Children's Social Care within the financial year where there has been a referral within the previous 12 months for the same child.
	11. Households prevented from becoming homeless or relieved of homelessness	The number of households that the council has either helped to stay in their current accommodation or has supported to relocate, preventing them from becoming homeless.
	12. Number of people rough sleeping	The number of rough sleepers are identified via weekly estimates provided by PATH (Plymouth Access to Housing), who undertake regular tours of the city.
	13. Long-term support needs met by admission to residential and nursing care homes (65+)	The number of people aged 65 years and over whose long-term social care needs following an assessment are met by admission to a residential or nursing care home.
Keep children, young people and adults protected	14. Children in care (rate per 10,000)	If a child/young person is made the subject of a care order, we have legal responsibility for them. We count a child as a 'child in care' if they get accommodation for a period of more than 24 hours, are subject to a care order, are accommodated under section 20 of the 1989 Children's Act or are subject to a placement order (adoption). To enable comparison against other authorities, we report the number as a rate per 10,000 children within our authority's population.
	15. Children with multiple child protection plans	The percentage of children starting a Child Protection Plan who have previously been on a Child Protection Plan. The current Plan may be for the same or different reasons and there might be a significant time lapse between Child Protection Plans.
	16. Closed adult safeguarding enquiries with desired outcomes fully/partially achieved	The percentage of safeguarding enquiries in which, at the point of completion, the individual affected or individual's representative's desired outcomes have been fully or partially achieved.
	17. Adult Social Care users who feel safe and secure	The proportion of people who use Adult Social Care (ASC) services who say that those services make them feel safe and secure, as measured using the annual Statutory ASC Survey.
Improved schools where pupils achieve better outcomes	18. Percentage of early years settings judged by Ofsted as good or outstanding	The Office for Standards in Education, Children's Services and Skills (Ofsted) inspect services providing education and skills for learners of all ages. Ofsted's role is to make sure that organisations providing education, training and care services in England do so to a high standard for children and students. There are four overall judgements: 'outstanding', 'good', 'requires improvement' and 'inadequate'. The aspiration in Plymouth is that all Early Years settings are judged as at least 'good' in their overall effectiveness. Please note that due to the COVID-19 outbreak, Ofsted inspections from March 2020 were suspended. Graded inspections resumed at the start of the 2021/22 academic year.
	19. Percentage of pupils attending a school judged by Ofsted as good or outstanding	The Office for Standards in Education, Children's Services and Skills (Ofsted) inspect services providing education and skills for learners of all ages. Ofsted's role is to make sure that organisations providing education, training and care services

<p>20. Percentage of Key Stage 4 pupils achieving the Basics (5+ in English and Maths)</p>	<p>in England do so to a high standard for children and students. There are four overall judgements: 'outstanding', 'good', 'requires improvement' and 'inadequate'. The aspiration in Plymouth is that all pupils attend a school that receives a minimum judgement of 'good' in their overall effectiveness. Please note that due to the COVID-19 outbreak, Ofsted inspections from March 2020 were suspended. Graded inspections resumed at the start of the 2021/22 academic year.</p> <p>Key Stage 4 is the phase of education attended by 14 to 16 year olds and leads to GCSE examinations. GCSEs are awarded a grade level between 1 and 9, with a strong pass (C+) being graded at a 5+ and the previous 'A' grade being graded at a level 7. Obtaining a 5+ in English and Maths is considered 'achieving the Basics'.</p>
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DELIVERING ON OUR COMMITMENTS		
Priority	Key performance indicators	Description
Empowering our people to deliver	<p>1. FTE days lost due to staff sickness</p> <p>2. Staff engagement</p>	<p>The average number of working days lost due to sickness per full-time equivalent (FTE) employee, calculated as a rolling 12 month average, excluding schools. Sickness data includes days lost due to physical and mental ill health, as well as injuries.</p> <p>A narrative overview of what we are doing to improve staff engagement.</p>
Providing a quality service to get the basics right	3. Customer experience score	<p>The customer experience score is an index KPI that takes into account performance against a number of indicators focused on the customer. Currently, this indicator considers customer complaints resolved in expected timescales; Freedom of Information (FOI) requests completed within 20 working days; the time taken to process new claims for Housing Benefit and Council Tax Support; percentage of bins reported as missed by customers; and the number of households prevented from or relieved of homelessness. Two points are allocated when an indicator is achieving target, one for a KPI that is amber against target (within 15%) and none for a KPI that is red against target (more than 15% away). The score is then represented as a percentage of the maximum score possible.</p>
Engaging with and listening to our residents, businesses and communities	4. Residents who know how to get involved in local decisions	<p>The percentage of Plymouth City Survey respondents who agreed with the statement 'I know how to get involved in decisions that affect my local area'.</p>
Providing value for money	<p>5. Spend against budget (£million)</p> <p>6. Council tax collected</p> <p>7. Business rates collected</p>	<p>The projected balance remaining against the council's overall budget at the end of the financial year, updated monthly.</p> <p>The percentage of council tax collected – this is a cumulative measure and shows whether or not the council is on track to collect all council tax by the end of the financial year, which contributes to the amount of money available to spend on services.</p> <p>The percentage of National Non-Domestic Rates (NNDR) collected against the amount due to be collected. NNDR is more commonly known as 'business rates' and charged on most properties that are used for non-domestic purposes, for example shops and offices. The collection of business rates represents approximately 61% of the council's overall income so it is important that the collection of NNDR is monitored.</p>

Championing Plymouth regionally and nationally	8. Offers and Asks	The Offers and Asks is our way of influencing the Government on what we need for the city. The 'Asks' are updated regularly and are used to advise and inform Plymouth's three Members of Parliament (MPs). A narrative update on progress is reported.
	9. Regional influence	A narrative update on progress made regarding our work with partners and neighbouring councils, as well as how we promote our regional leadership role.

This report was produced by the Plymouth City Council Performance and Risk Team. For further information, please contact:

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Cabinet



Date of meeting:	08 September 2022
Title of Report:	Plymouth Plan Annual Report 2022
Lead Member:	Councillor Rebecca Smith (Cabinet Member for Homes & Communities)
Lead Strategic Director:	Tracey Lee (Chief Executive), Giles Perritt (Assistant Chief Executive), Anthony Payne (Strategic Director for Place), Sharon Muldoon (Director of Children's Services), Craig McArdle (Strategic Director for People), Ruth Harrell (Director of Public Health), Andy Ralphs (Strategic Director of Customer and Corporate Services, Brendan Arnold (Strategic Director for Finance)
Author:	Jonathan Bell, Head of Development Planning (SP&I) and Sarah Gooding, Policy and Intelligence Advisor (Chief Executive Office)
Contact Email:	Sarah.gooding@plymouth.gov.uk
Your Reference:	PPAR2022
Key Decision:	No
Confidentiality:	Part I - Official

Purpose of Report

Since its inception in 2014, the Plymouth Plan has set out a shared direction of travel for the long term future of the city of Plymouth. This is the second annual report that has been produced and it provides Cabinet with an overview of progress over the past year, for each of the different elements of the plan. It also provides an opportunity to reflect on progress in the first seven years of the plan.

Some of the changes that can be seen since 2021 include:

- An increase in healthy life expectancy for both males and females (page 7)
- A further reduction in carbon emissions (page 13)
- An improvement in Key Stage 4 attainment 'achieving the basics' (page 16)
- A reduction in visitors to the city as a result of the Covid-19 pandemic (page 20)

Recommendations and Reasons

That Cabinet notes the content of the report.

Alternative options considered and rejected

Not applicable

Sign off:

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Originating Senior Leadership Team member: All

Please confirm the Strategic Director(s) has agreed the report? Yes

Date agreed: 09/08/2022

Cabinet Member approval: *[electronic signature (or typed name and statement of 'approved by email/verbally')]* Councillor Rebecca Smith approved verbally.

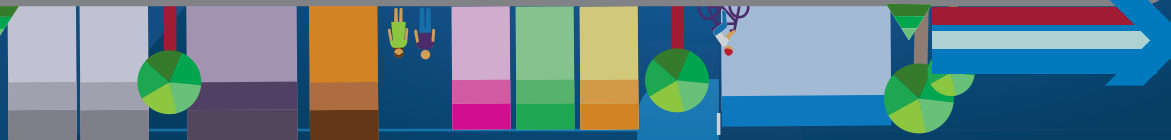
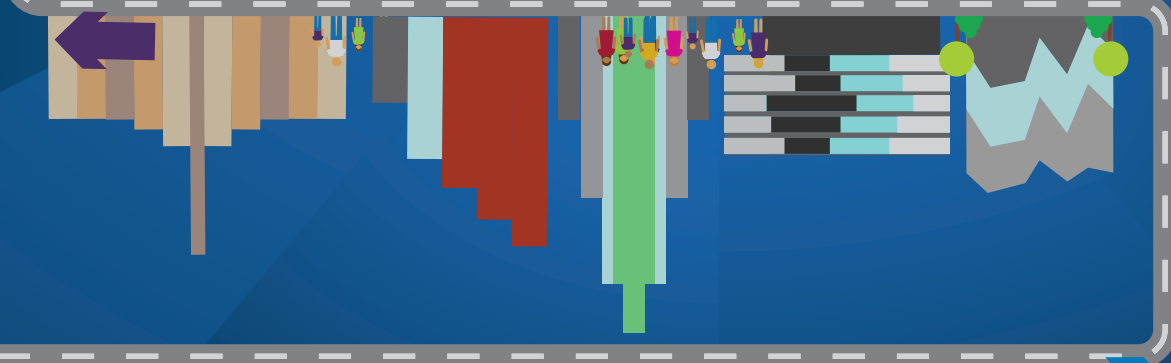
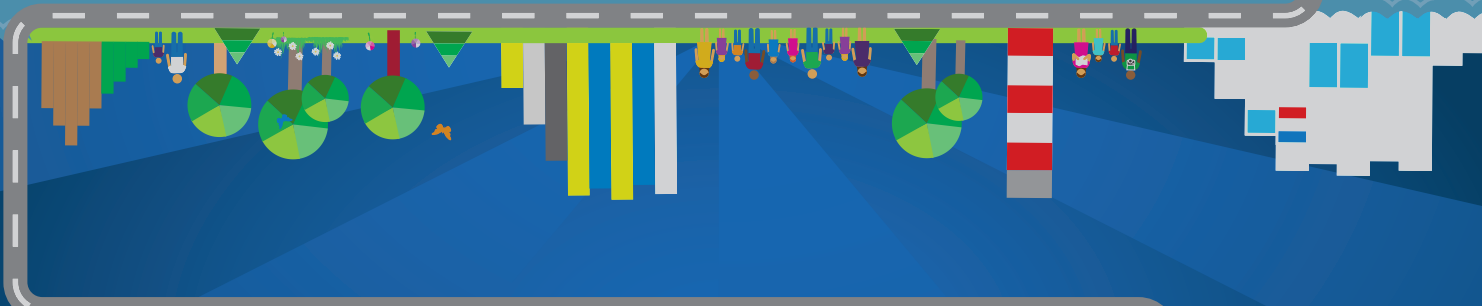
Date approved: 10/08/2022

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THE PLYMOUTH PLAN ANNUAL REPORT

AUGUST 2022



Contents

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1. Introduction

1.1 Since its inception in 2014, the Plymouth Plan has set out a shared direction of travel for the long term future of the city of Plymouth, helping to achieve an ambition to become one of the most vibrant waterfront cities in Europe where an outstanding quality of life is enjoyed by everyone.

1.2 Transforming the city is a long term venture requiring careful planning and investment and a persistent focus on delivery. This annual report provides an overview of progress over the past year, for each of the different elements of the plan. It also provides an opportunity to reflect on progress in the first six years of the plan.

1.3 This report forms part of a suite of documents which also includes the [Plymouth Report](#) and the [Authorities Monitoring Report](#). The Authorities Monitoring Report (AMR) is a statutory document that the JLP Councils are required to produce annually, which sets out key indicators demonstrating the progress on delivery of the Plymouth and South West Devon Joint Local Plan. The Plymouth Report provides an overview of the needs and issues facing the city – with an accompanying narrative about the shared challenges and opportunities that we face. To understand the health of the city, it is essential to also understand the city's geography, its population and the environment within which its residents live and work. We also need to understand the economic context of the city such as jobs, wages, infrastructure and economic growth. The Plymouth Report is the core document forming the Joint Strategic Needs Assessment (JSNA), supported by other in depth reports which can be accessed through the website. Though the Plymouth Report is usually updated regularly, this process has been delayed to allow the incorporation of the 2021 Census data, which is a critical source of information to inform our analysis. The updated Plymouth Report will be released in April 2023.

2. Summary of key findings

The tables below provide a summary overview of the trends for each indicator, and an overall indication of the direction of travel. You can view more detail and see the data behind each indicator in Section 4.

Healthy city

● Improvement ● No change ● Deterioration ○ Base data

INDICATOR	2014	2015	2016	2017	2018	2019	2020	2021	2022	OVERALL TREND
A(i) Male healthy life expectancy at birth	○	●	●	●	●	●	●			●
A(ii). Female healthy life expectancy at birth	○	●	●	●	●	●	●			●
B. Over 65s emergency hospital admissions for Plymouth residents 2016 to 2020 (per 10,000)				○	●	●	●	●		●
C. % of residents who regularly (once a month or more) do voluntary work (formal and informal)					○		●			●
D(i). % of residents who feel safe outside in their local area during the day	○				●		●			●
D(ii). % of residents who feel safe outside in their local area after dark	○				●		●			●
E. Overall satisfaction of people who use services with their care and support (extremely or very satisfied)			○	●	●	●	●			●

Growing city

● Improvement ● No change ● Deterioration ○ Base data

INDICATOR	2014	2015	2016	2017	2018	2019	2020	2021	2022	OVERALL TREND
A. Population of Plymouth	○	●	●	●	●	●	●	●		●
B. Carbon emissions per capita	○	●	●	●	●	●	●			●
C. Gap between national living wage and 10th percentile	○	●	●	●	●	●	●		●	●
D(i). % of Early Years Foundation Stage (EYFS) children achieving a good level of development (measured against national benchmark)	○	●	●	●	●	●				●
D(ii). Key Stage 4 Attainment 8 achieving the 'basics' (measured against national benchmark)	○	●	●	●	●	●	●	●		●
E. Capital investment in infrastructure				○					●	●

International city

● Improvement ● No change ● Deterioration ○ Base data

INDICATOR	2014	2015	2016	2017	2018	2019	2020	2021	2022	OVERALL TREND
A. % of residents who agree that Plymouth has a lot to offer					○		●			●
B. Visitor numbers	○	●	●	●	●	●	●			●
C. Jobs in high-tech manufacturing and scientific research and development	○	●	●	●	●	●	●			●
D(i). UK ranking of Plymouth's universities (overall score) – University of Plymouth	○	●	●	●	●	●	●	●	●	●
D(ii). UK ranking of Plymouth's universities (overall score) – Plymouth Marjon University	○	●	●	●	●	●	●	●	●	●
D(iii). UK ranking of Plymouth's universities (student satisfaction) – University of Plymouth	○	●	●	●	●	●	●	●	●	●
D(iv). UK ranking of Plymouth's universities (student satisfaction) – Plymouth Marjon University	○	●	●	●	●	●	●	●	●	●
E. % of residents who agree with the statement: my local area is a place where people from different backgrounds get on well together	○				●		●			●

3. Methodology

3.1 A suite of high level indicators has been developed to monitor progress towards the strategic outcomes and objectives within the plan. This is a deliberately limited indicator set, structured around each of the Measures of Success identified in the Plymouth Plan.

3.2 The indicator set has been split into the four categories of Healthy City, Growing City, International City and Spatial Strategy, however it is recognised that all work together in a complex system of interaction. The Spatial Strategy indicators are reported elsewhere, in the Authorities Monitoring Report.

3.3 These indicators provide insight as to how the city is progressing on delivery against these objectives and highlight where further deep-dive analysis is needed to understand what is preventing sufficient progress. This insight also enables reviews and refreshes of the Plan to take place, ensuring it remains relevant to current challenges and that focus is given to those areas that are not yet showing improvement.

3.4 The indicators have been updated with the latest available data and at least three years of data have been included wherever possible. Also, where possible, progress is benchmarked against regional and national outcomes. The primary source of the data or statistic is shown for each indicator. It should be noted that, due to the natural lag in data reporting, some indicators are still reporting data prior to the Covid-19 pandemic. Therefore, any impact of the pandemic on these indicators may not show in this report.

4. Context

4.1 With a resident population of 264,700, Plymouth is the largest city on the south coast of England and the 15th largest in the country. Plymouth is also the most significant urban area on the south west peninsula and the key urban hub of the Heart of the South West Local Enterprise Partnership.

4.2 Plymouth is Britain's Ocean City. Its connections to the sea go back beyond the sailing of the Mayflower in 1620 and now include Western Europe's largest naval base, a thriving commercial and ferry port, a significant fishing industry, and one of the most important global concentrations of marine research and production. The sea, coastline and maritime heritage are some of Plymouth's greatest assets.

4.3 Plymouth has experienced significant regeneration and transformation over the last ten to fifteen years and this is set to continue however, the city also faces some significant long-term challenges. Plymouth is the most significant urban area on the South West peninsula yet it suffers from poor road and rail connectivity. The average rail journey time from Plymouth to London is eight minutes slower than from Newcastle to London, and yet the route is 40 miles shorter.

4.4 The city has traditionally struggled to raise its competitiveness and productivity (Plymouth's GVA per hour worked stands at around 86 per cent of the UK average). This is, in part, due to a low business density and start-up rate, and poor connectivity with the rest of the region and country, a potential deterrent for inward investment and the migration of skilled workers. The city is also a low wage economy with Plymouth workers receiving £521 weekly compared to £577 nationally.

4.5 The city has higher than average levels of deprivation and health inequalities. Plymouth is within the 20% most deprived local authority districts in England. Two areas fall within the most deprived 1% in England while 28 fall within the most deprived 10% in England, affecting around 46,000 people within the city. Just under 1 in 5 children in Plymouth are estimated to be living in poverty.

4.6 The health of people in Plymouth is generally worse than the England average, with life expectancy for both men and women lower than the England average. Within Plymouth, there is considerable inequality in health, with a difference of 7.5 years in life expectancy across the city.

4.7 The 2021 census data shows the population of Plymouth has continued to age. There has been a 17.7% increase in those aged 65 and over compared to 2011 figures. The population of younger age groups have declined with a reduction across all groups aged 29 and below, with the exception of the population of those aged 5-9. More detailed census data will be released in the Plymouth Report 2023. There will be a major shift in the population structure of Plymouth over the next 15 years as the proportion of the population aged 65 and over increases. A rise in the percentage of the Plymouth 65+ population is projected, from 18.5 per cent in 2020 to 22.7 per cent by 2034. An ageing population suggests an increasing need for care and support services and also an increasing burden placed on the working age population. Further information can be found in the [Plymouth Report](#) which provides an overview of the needs and issues facing the city.

5. Primary indicators update

Healthy city

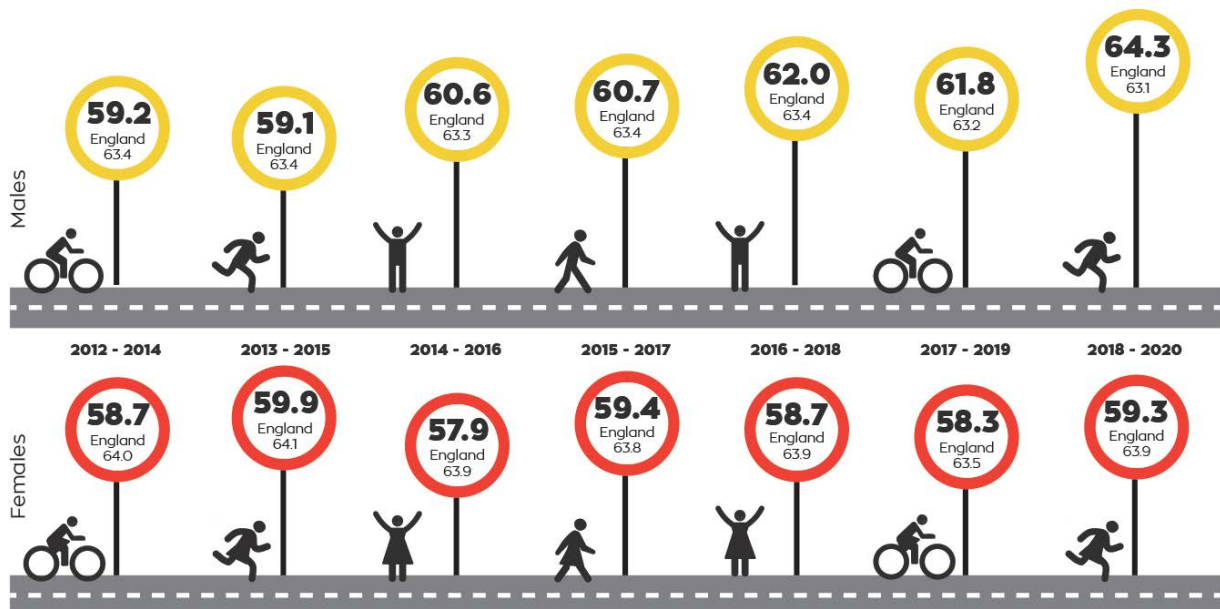
What we are trying to achieve - our strategic objective for a healthy city

Strategic Outcome

People in Plymouth live in happy, healthy, safe and aspiring communities, where social, economic and environmental conditions and services enable choices that add quality years to life and reduce the gap in health and wellbeing between communities.

People in Plymouth get the best start to life with improved health, increased life expectancy, and a better quality of life

Primary Indicator A - Healthy life expectancy at birth (males and females)



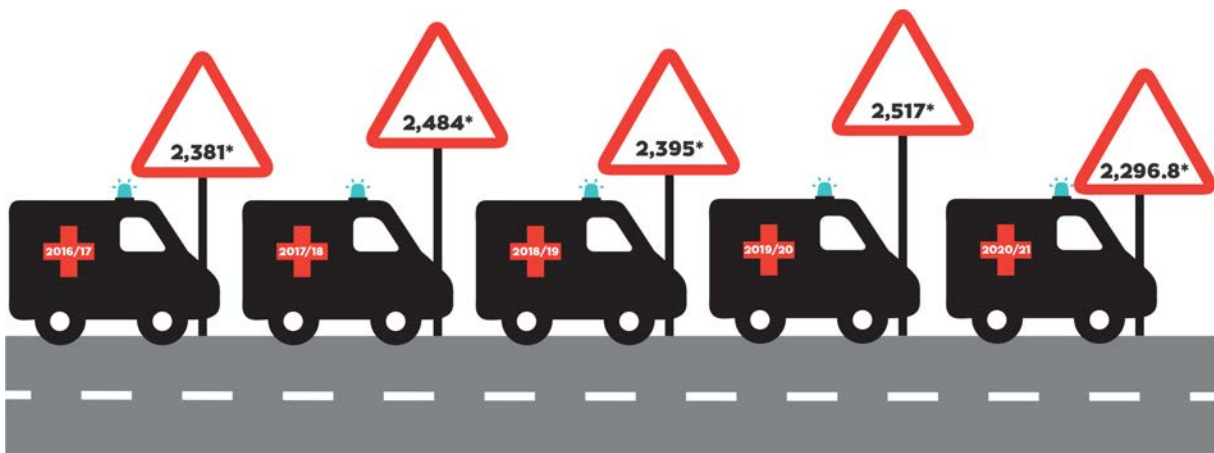
Source: [Public Health England](#)

Comments

Whilst healthy life expectancy in females has risen slightly in Plymouth, it remains below the England average of 63.9. Health life expectancy in males has risen in Plymouth and is now slightly above the England average which has remained flat over this time period.

More people taking care of themselves

Primary Indicator B - Over 65s emergency hospital admissions for Plymouth residents



Source: [Hospital Episode Statistics](#)

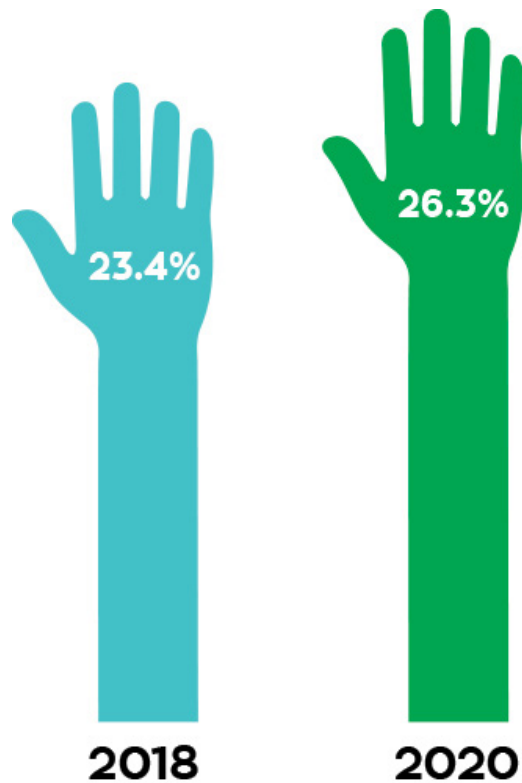
*directly age standardised rate per 10,000

Comments

In Plymouth the rate of hospital admissions in the over 65s has decreased since 2019/20. However, this reduction is likely to be due to the Covid pandemic and any comparison to rates prior to 2020 should be treated with caution. It is likely to be a few years before we can say with certainty that there has been a sustained reduction in over 65 emergency hospital admissions.

More residents are contributing to and are involved in their local community

Primary Indicator C - % of residents who regularly (once a month or more) do voluntary work (formal and informal)



Source: [Plymouth City Survey](#)

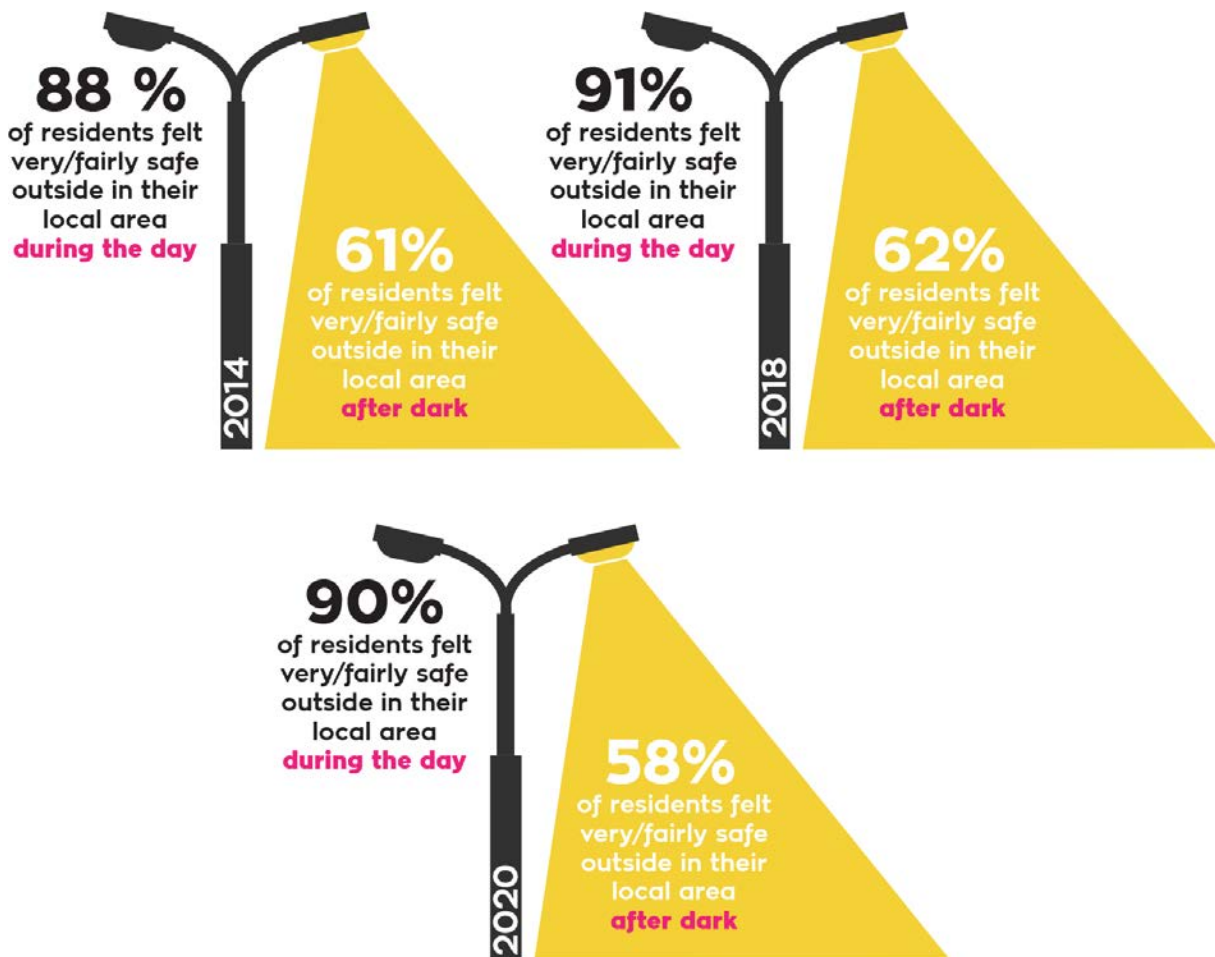
Comments

There has been an increase in the percentage of respondents who report that they regularly (once a month or more) do formal or informal voluntary work from 23.4% in 2018 to 26.3% in 2020. The city currently has a volunteer work programme with the aim of increasing the number of volunteers (at least once a month) by 1 per cent per year for five years. There was also a focus on recruiting volunteers for the Mayflower 400 activities in 2020.

The effects of the Covid-19 pandemic may well impact on the rate of volunteering going forward and this will be seen in the 2022 City Survey.

People of Plymouth are well housed and live in good quality, well looked after neighbourhoods where they feel safe and happy

Primary Indicator D - % of residents who feel safe outside in their local area



Source: [Plymouth City Survey](#)

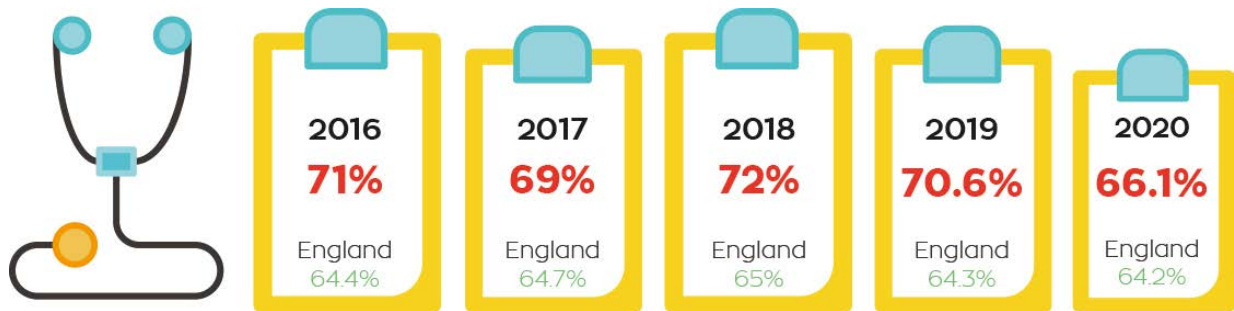
Comments

90% of respondents felt safe in their local area during the day and 58% after dark in 2020. This is slightly higher than in 2014 for during the day although no significant change from 2018.

There has been a decrease of 3% for those feeling safe after dark between 2014 and 2020 and further analysis is needed to understand this change. The proportion of younger respondents feeling safe after dark aged 16 to 24yrs (44%) was significantly lower than those aged 45 to 54yrs (61%).

Good quality and sustainable health and wellbeing services for people who need them, whether they are public services or care in the community

Primary Indicator E - Overall satisfaction of people who use services with their care and support (extremely or very satisfied)



Source: [NHS Personal Social Services Adult Social Care Survey](#)

Comments

Although satisfaction rates appear to have fallen in Plymouth in recent years, overall satisfaction remains higher than both the England average (64.2%) and the CIPFA comparator group average (63.5%). The rate of satisfaction in 2019/20 dropped among those people aged 65 and over living in the community and among clients with a learning disability. An action plan is in place to target these client types and to raise satisfaction rates.

Due to COVID-19 no survey was done in 2020/21 with the next survey due later in 2022. It is difficult to predict the impact of the COVID-19 pandemic on satisfaction rates when the next survey is undertaken.

Growing city

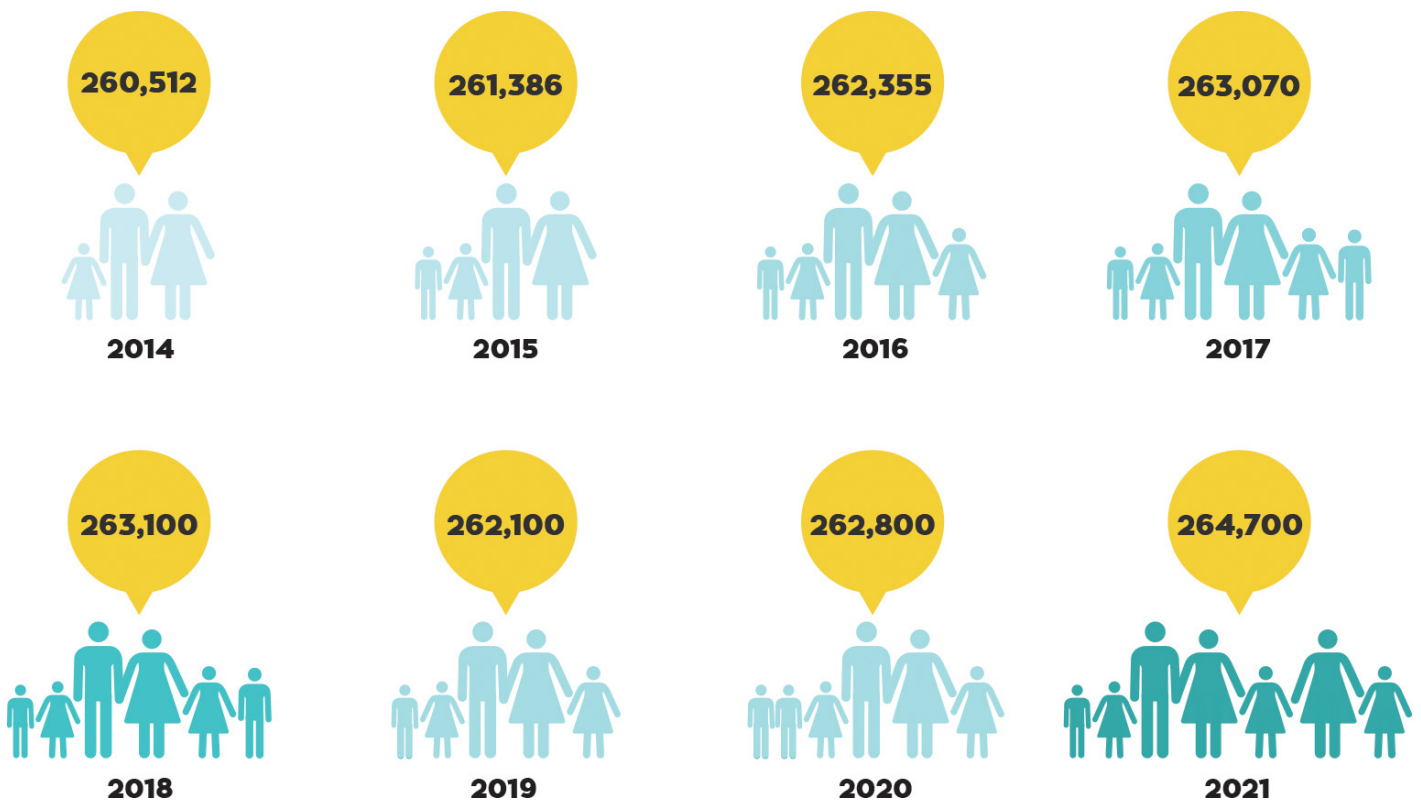
What we are trying to achieve - our strategic objective for a growing city

Strategic Outcome

Plymouth has used its economic, social, environmental and cultural strengths to deliver quality and sustainable growth. The city's long term prosperity has been improved, and its economy has been transformed and rebalanced. It has raised its productivity, and provides higher average wages as well as employment opportunities to support a skilled and talented workforce. Its population has grown to nearly 300,000 by 2034.

The population has grown to achieve the city's ambition (population of 300,000)

Primary Indicator A - Plymouth's population



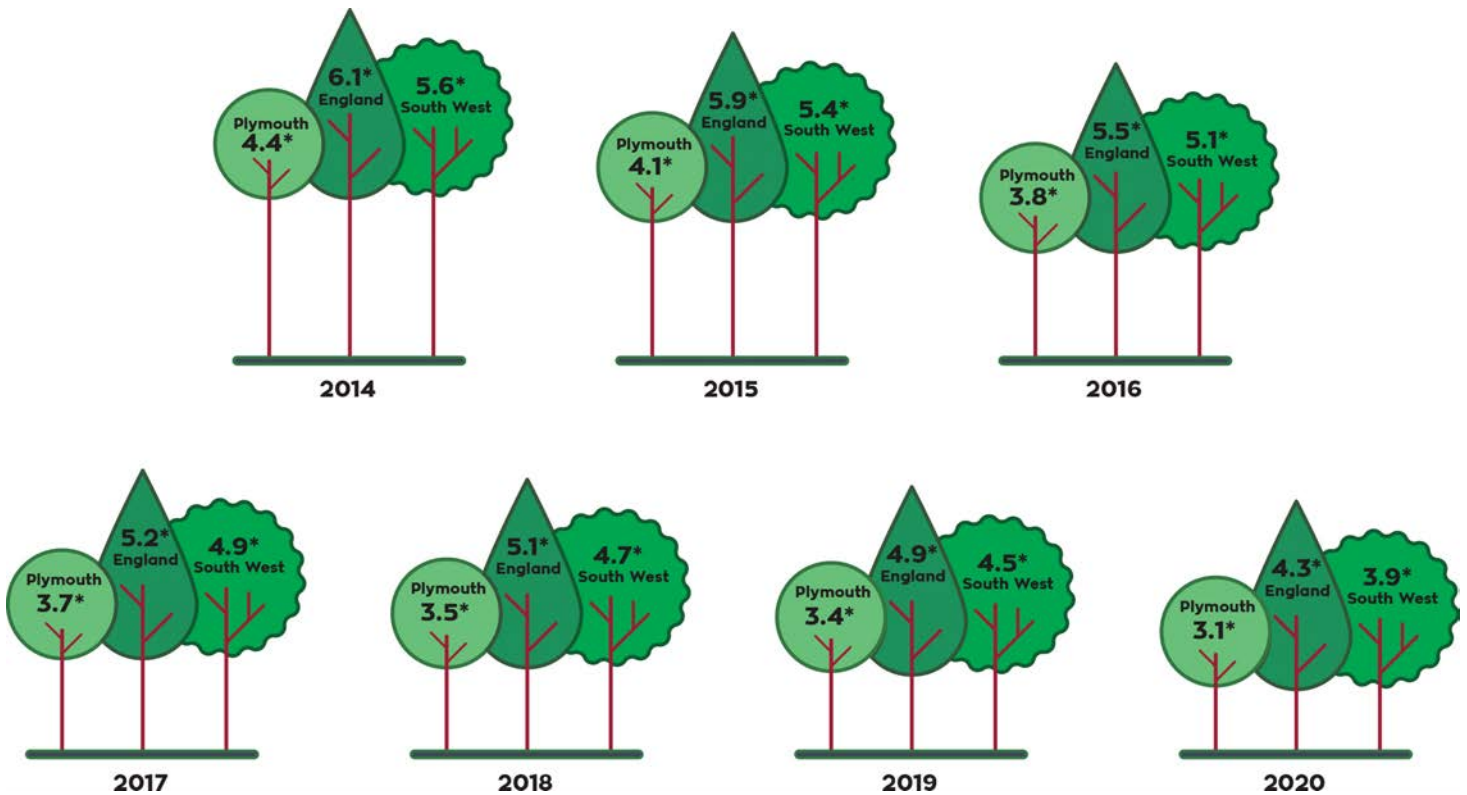
Source: [Office for National Statistics](#)

Comments

The Plymouth Plan aspires to see the city grow to nearly 300,000 in population by 2034. The measure relates to Plymouth as a functional urban area, including places such as Sherford, Woolwell and Land at West Park Hill where over 7,900 new homes are planned, but for now the more tightly defined administrative boundary of Plymouth is used as a proxy measure. The population (as measured by the Office for National Statistics) has increased by 1.6% between 2014 and 2021. This compares to an increase of 4% in England as a whole. The figures for 2021 are taken from the 2021 Census rather than from estimates based on 2011 so give a more accurate picture than in previous years. Looking forward, there is a need to consider Plymouth’s population aspirations in the context of national planning reforms, the climate emergency, and any impacts on population change arising from issues such as Brexit and the COVID pandemic.

Plymouth continues to be recognised as a leading green city

Primary Indicator B - Carbon emissions per capita (tCO2e)



Source: [Department for Business, Energy and Industrial Strategy](#)

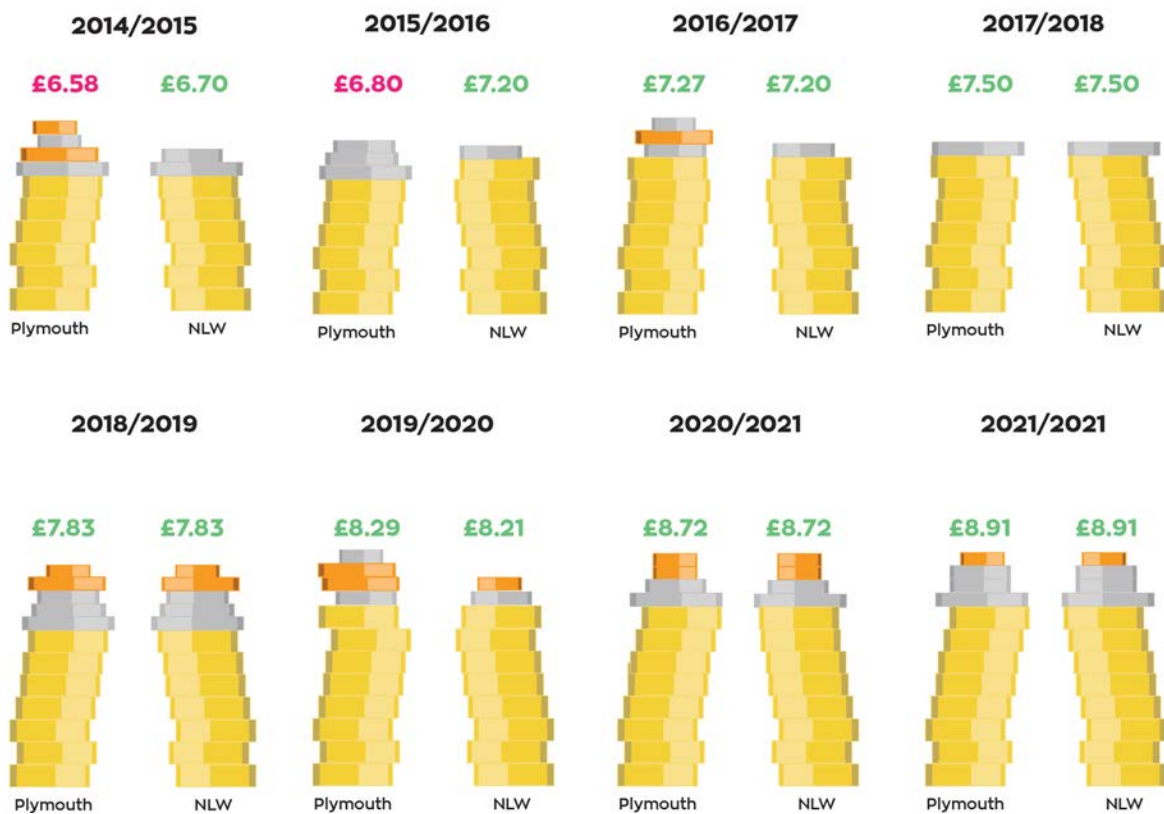
* Carbon emissions per capita (tCO2e)

Comments

Plymouth’s carbon emissions per capita have fallen steadily over the past 6 years, reducing from 4.4t tonnes of carbon dioxide equivalent (tCO2e) in 2014 to 3.1 in 2020 (latest available data). Substantial increases in the amount of renewables in the energy mix nationally have helped continue this reduction, and it is likely that the impact of the Covid pandemic was behind some of the decrease in 2020. The Council’s declaration of a Climate Emergency in 2019 has ensured that action at a local level plays a key role too. The city published its third annual [Climate Emergency Action Plan](#) in January 2022.

Plymouth has a vibrant, productive, inclusive and innovative business sector with a workforce that is paid a living wage

Primary Indicator C - Gap between 10th percentile and national living wage



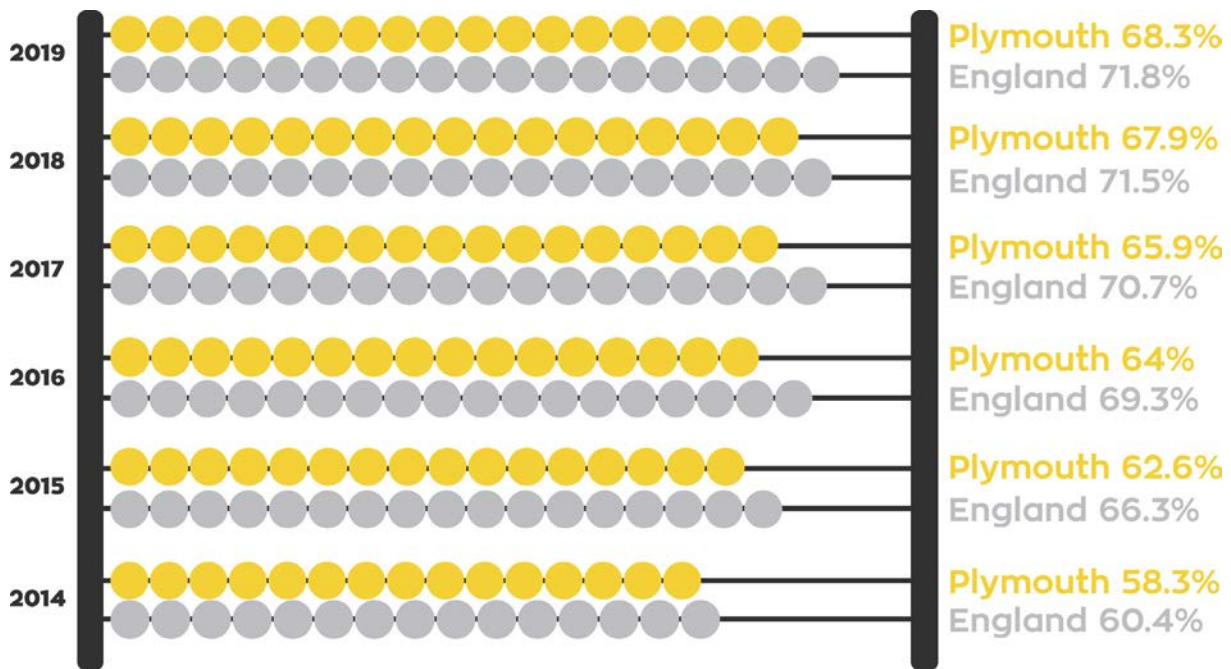
10th percentile wage per hour vs National Living Wage per hour, excluding overtime (£7.86 is 10th percentile, so less than 10% earn less than this. £7.83 is national living wage).

Source: ONS/NOMIS

Comments

Early in the plan period (2014/15 and 2015/16) Plymouth’s 10th percentile wage level was below the National Minimum Wage but has since moved up to and kept pace with accelerating rises in the National Minimum Wage.

Primary Indicator D(i) - % of Early Years Foundation Stage (EYFS) children achieving a good level of development



Source: [DfE Explore Education statistics](#)

Please note there are no results for 2020 or 2021 due to COVID-19

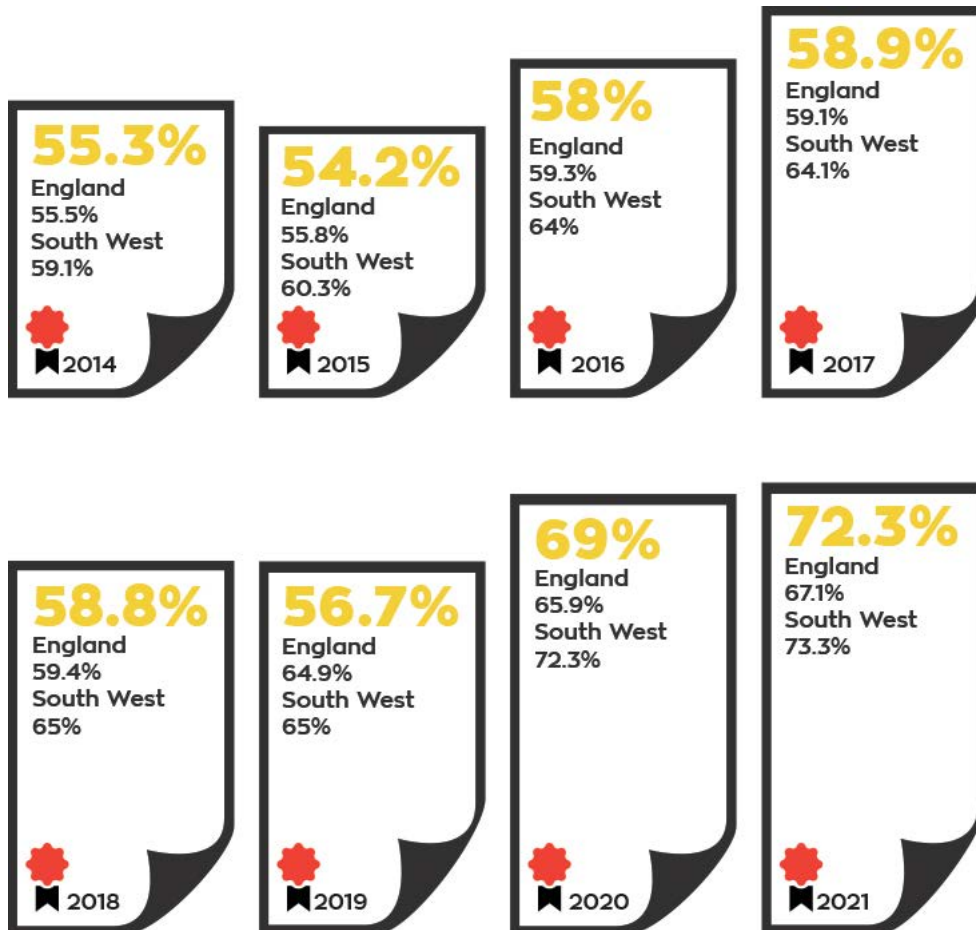
Comments

Since 2014, the percentage of Early Years Foundation Stage pupils achieving a good level of development has increased by 10 percentage points (from 58.3% in 2014 to 68.3% in 2019). However, this is below the level of improvement nationally, which has increased by 11.4 percentage points (60.4% in 2014 to 71.8% in 2019), and the gap between Plymouth and the national benchmark has widened from 2.1% to 3.5%.

In 2020 and 2021, academic testing within the Early Years was cancelled due to the Coronavirus pandemic and there is growing evidence that the pandemic has had a significant impact on the communication and language development of children birth to five, which may affect long term learning and development unless the necessary support and interventions are secured.

The people of Plymouth have the skills to be school ready and work ready to meet the needs of the city, enabling them to avoid poverty

Primary Indicator D(ii) - Key Stage 4 Attainment 8 achieving grade 9-4 (standard pass) in English and Maths



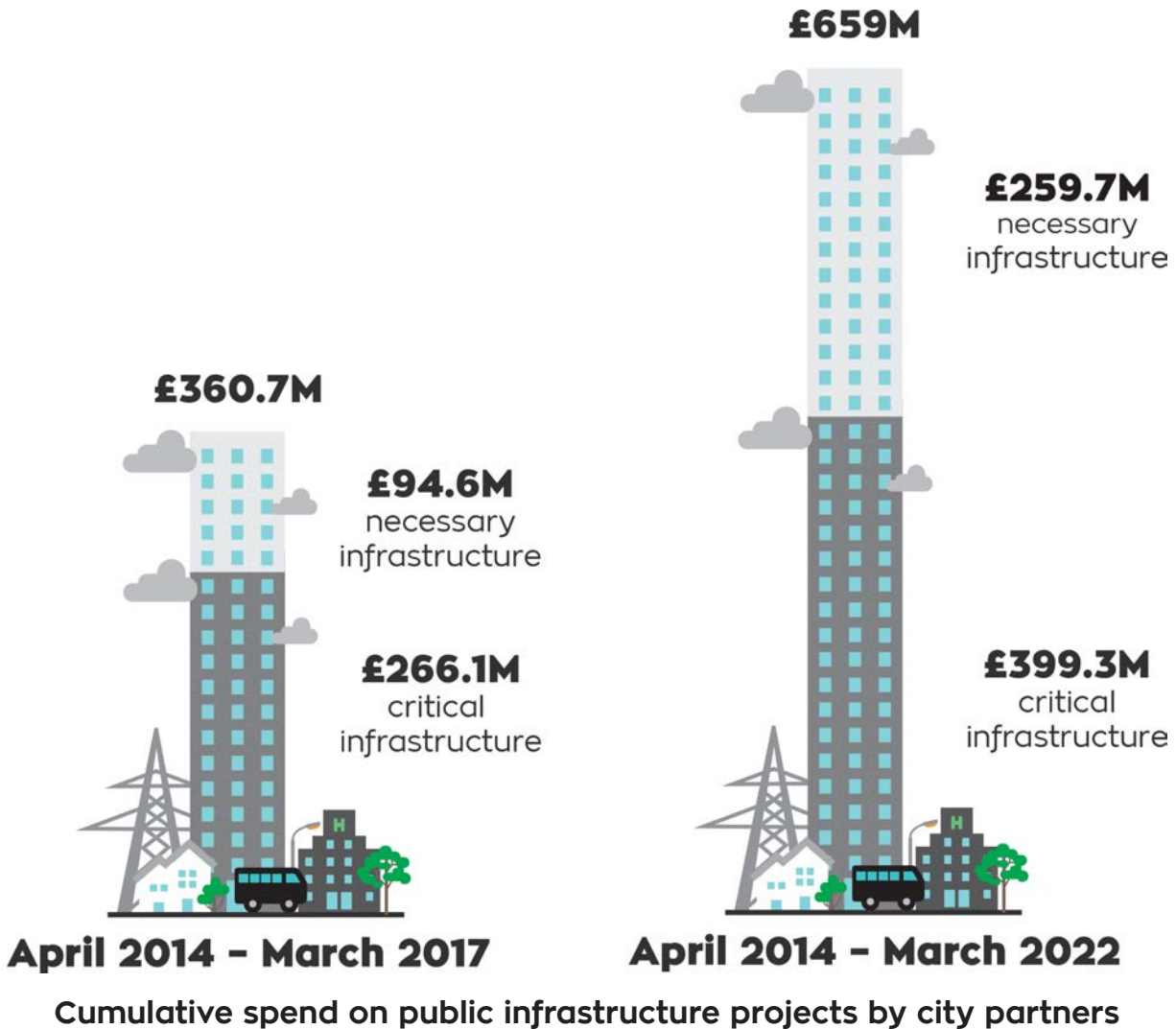
Source: [DfE Explore Education statistics](#)

Comments

The 2019/20 and 2020/21 academic years will not be comparable to previous years due to the reliance on teacher assigned grades as a result of COVID-19 and the cancellation of formal exams. This explains the large increase from 56.7% in 2018/19 to 69.0% in 2019/20.

Plymouth continues to strengthen the conditions for increased growth and investment including ensuring effective infrastructure systems

Primary Indicator E - Capital investment in infrastructure



Comments

The Plymouth and South West Devon Infrastructure Needs Assessment 2017 sets out the infrastructure needed to support the Plymouth Plan and Joint Local Plan. 102 projects were identified as being critical over a 20 year timeframe. Infrastructure is defined as critical where it is needed to unlock growth and development that might not otherwise happen. To date, 41 of these projects (40%) have either been completed or started with a spend of nearly £400 million. These include the Energy from Waste Plant, Central Library, Derriford Transport Scheme, Oceansgate, School investment at Holy Cross, Pilgrim, St Matthews, Cann Bridge, Saltram Meadow, Pomphlett and Yealmpstone Farm, Millbay and City Centre Drainage Corridor and the Forder Valley Link Road.

In addition, there has been significant expenditure on infrastructure projects identified as necessary to support the city's sustainable growth agenda. Over £260 million has been spent on schemes that have been completed or started such as Well Being Hubs, Derriford Hospital, Sewage Treatment Works, Schools, Playing Pitch improvements, Extra Care Facilities, electricity renewal and improvements and The Box cultural destination.

International city

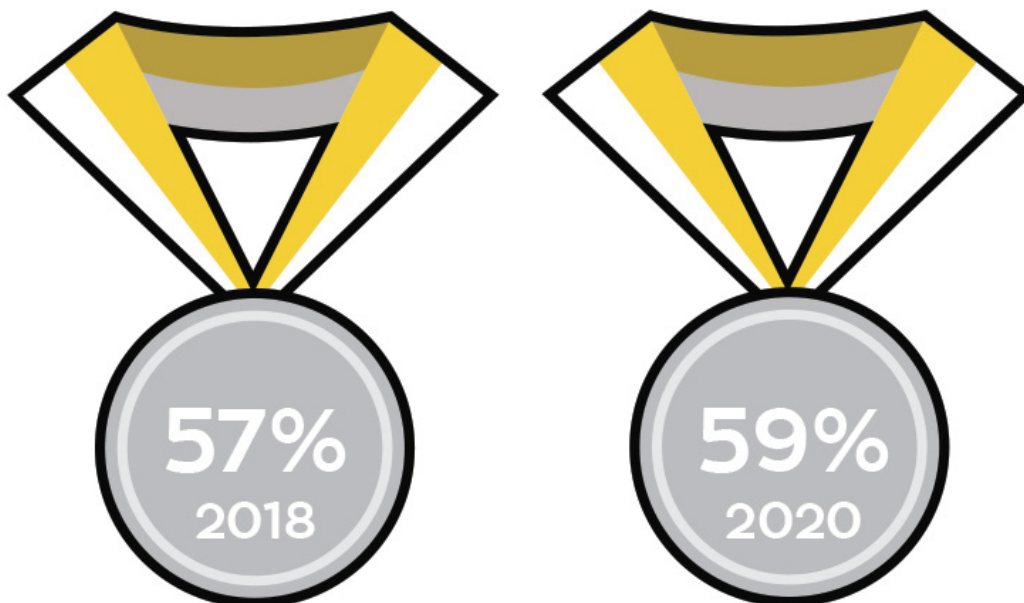
What we are trying to achieve - our strategic objective for an international city

Strategic Outcome

Plymouth is internationally renowned as Britain's Ocean City and is the UK's premier marine city, famous for its waterfront and being home to the UK's first National Marine Park. It is recognised as unique among UK cities for its natural drama and for its 500 year old history as a place of embarkation and exploration. Plymouth's continuing journey towards a world leading marine city supports the cultural experiences it offers to visitors who are looking for authenticity and character. The city's world class universities and research institutions are recognised for their innovation, and Plymouth is a place where businesses can capitalise on a unique economic position and talented workforce. Visitors from around the world are welcomed to a city that provides a diverse cultural experience and a perfect base for enjoying the city's surrounds, land and marine. Plymouth is an international city that local communities can enjoy, be a part of and be proud of.

Plymouth continues to improve its diverse cultural and sporting experience with great venues, major events, good food and hospitality offer

Primary Indicator A - Agreement with the statement 'Plymouth has a lot to offer'



Source: [Plymouth City Survey](#)

Comments

The proportion of residents agreeing that Plymouth has a lot to offer (cultural offer, events) has remained fairly consistent with 59% agreeing with this statement in the 2020 City Survey compared to 57% in 2018.

People in the age group 45 to 54 year were significantly more likely to disagree with this than those in older age groups (65+). This could reflect that the city has less to offer people in this age group and further research could help to identify what events or activities are considered to be missing.

Plymouth is internationally renowned as a leading UK tourist destination

Primary Indicator B - Visitor numbers



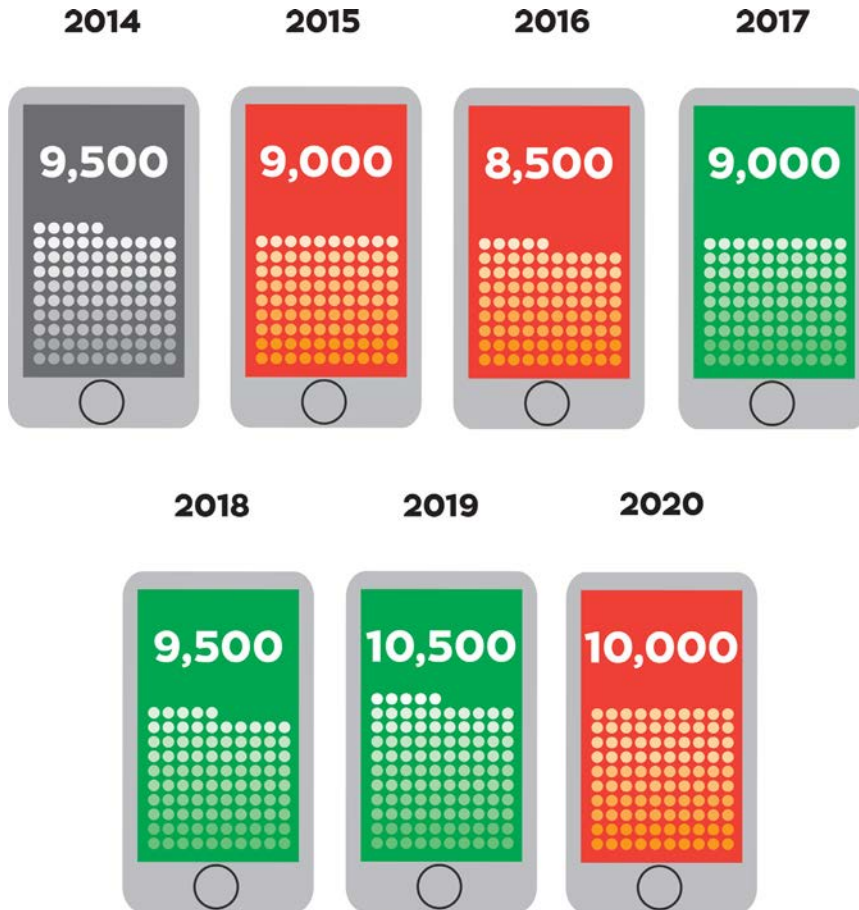
Source: South West Research Company

Comments

Visitor numbers have demonstrated a clear increase over the plan period to 2019 (about 1% a year). However, the visitor economy has been one of the hardest hit sectors by the COVID-19 pandemic and recent statistics show a reduction in visitors of over 50% from 2019 which will undoubtedly take a few years to recover from.

Plymouth is recognised internationally for expertise in the marine science and high technology manufacturing sectors

Primary Indicator C - Jobs in high-tech manufacturing and scientific research and development



Source: University of Plymouth/AMORE

Comments

Statistics for this indicator suggest a variable but nevertheless clear increase (about 2% a year) to date in high-tech job numbers in Plymouth.

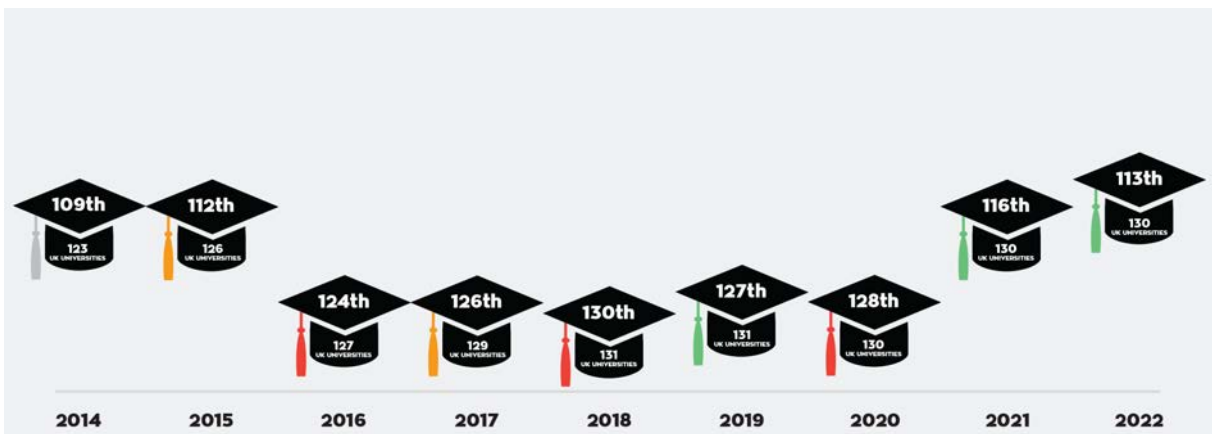
Plymouth’s reputation for world class universities and research institutions continues to grow

Primary Indicator D(i) - UK ranking of Plymouth’s universities (overall score) – University of Plymouth



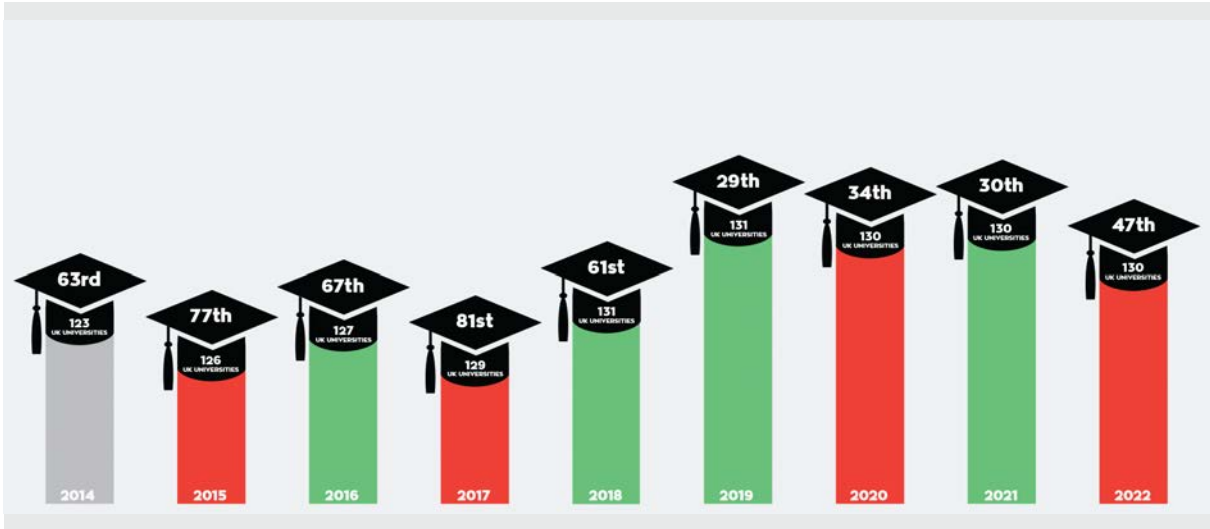
Source: [Complete University Guide](#)

Primary Indicator D(ii) - UK ranking of Plymouth’s universities (overall score) – Plymouth Marjon University



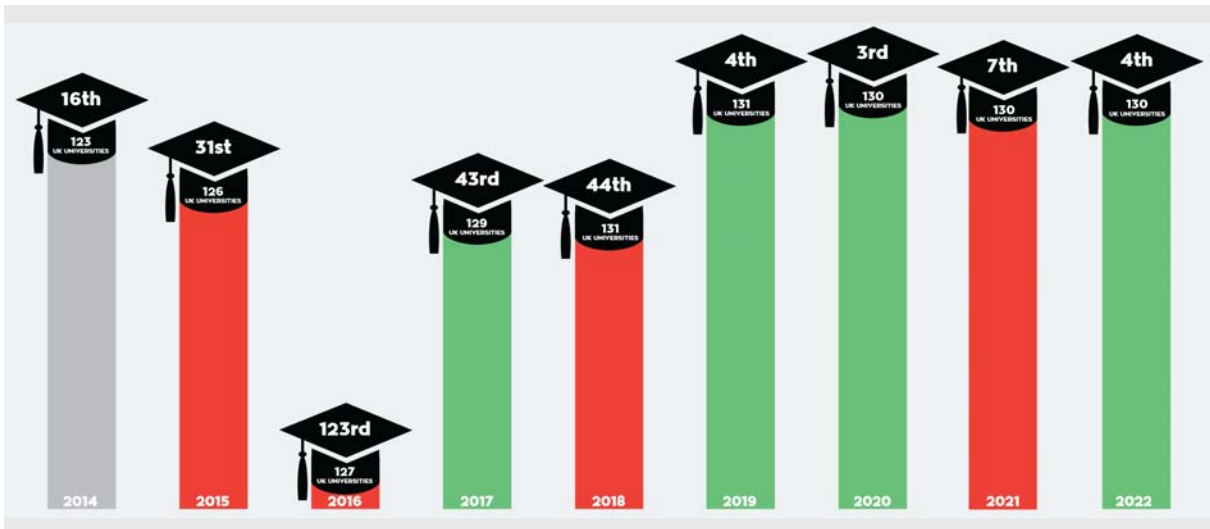
Source: [Complete University Guide](#)

Primary Indicator D(iii) - UK ranking of Plymouth’s universities (student satisfaction) – University of Plymouth



Source: [Complete University Guide](#)

Primary Indicator D(iv) - UK ranking of Plymouth’s universities (student satisfaction) – Plymouth Marjon University



Source: [Complete University Guide](#)

Comments

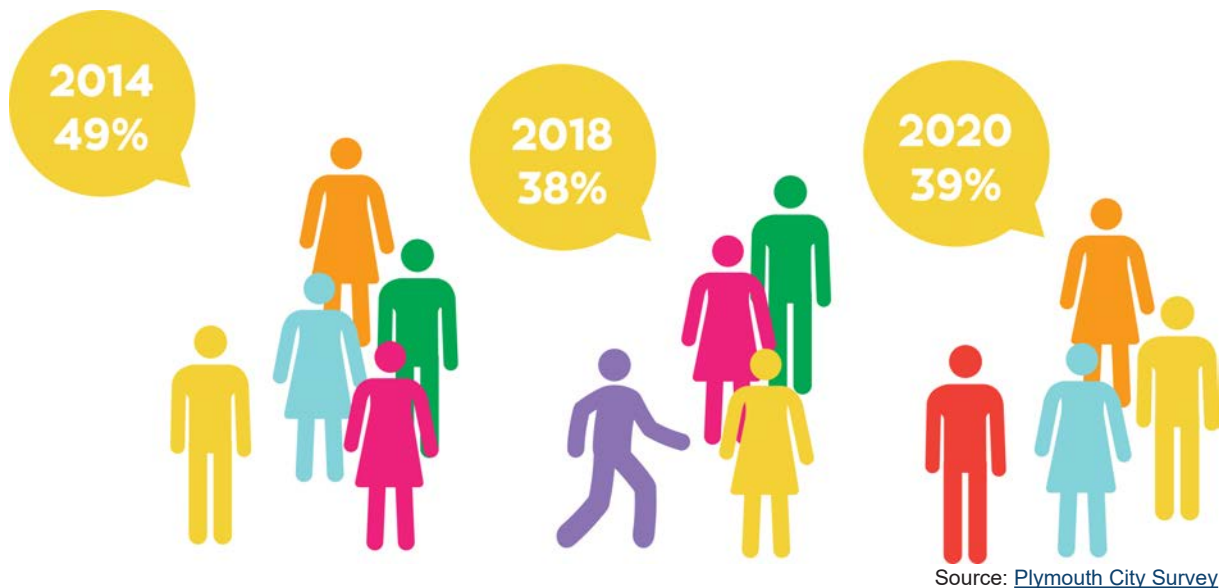
According to the Complete University Guide UK university rankings, the University of Plymouth and Plymouth Marjon University have both been on the up in recent years. The overall score covers a wide range of criteria including, for example, entry standards, graduate prospects, and academic services and facilities spend. On the criteria of student satisfaction, Plymouth Marjon University scores particularly highly, ranked fourth in the UK and first amongst all English universities. There are other national and global guides for university rankings which also provide useful information, such as the Times Good University Guide. Globally, according to the Times Higher Education World University Rankings, the University of Plymouth has consistently been ranked

within the banding 601-700, with a recent improvement shown since 2021, from a ranking of 501-600 recorded in 2020 to 401-500 in both 2021 and 2022. There are no global rankings awarded to the Plymouth Marjon University at this time.

Plymouth's newest university, Arts University Plymouth, doesn't yet feature in the Complete University Guide but will hopefully be able to be incorporated into future Annual Reports.

Plymouth's reputation is strengthened as a welcoming, multicultural city where a broad range of partners promote the benefits of diversity

Primary Indicator E - % of residents who agree with the statement: my local area is a place where people from different backgrounds get on well together



Comments

The proportion of residents agreeing their local area is a place where people from different backgrounds get on well together has stayed consistent at 39% in 2020 compared with the 2018 City Survey where 38% agreed. However, there has been a significant decrease from 49% in 2014 (Plymouth Wellbeing Survey).

6. Look ahead

6.1 In addition to looking backwards, this annual report provides a baseline so that in future years, we can assess how national challenges have impacted upon the city and its direction of travel. The following section considers some of the main current challenges.

Coronavirus pandemic

6.2 The Coronavirus pandemic has had a significant impact on the city and the lives of its residents since it first began in early 2020. Covid-19 rates have remained persistently high in the city during 2022 and, whilst the city has a strong vision for the future and plan for recovery, it is still facing some unprecedented challenges going forward, not least in terms of the sustainability of the health and social care workforce. Whilst it remains too early to assess the full impact of the pandemic, some of the challenges facing us can already be identified.

6.3 The economic impacts of the pandemic were deep and, even with the city having strong plans for recover, are still ongoing in some instances and there are longer term legacy impacts, the extent of which we may not fully see for several years. Leisure, hospitality, non-food retail and tourism were some of the sectors most seriously affected in Plymouth. The visitor economy was one of the hardest hit sectors and this can be seen on page 18, with visitor numbers decreasing from 5,279,000 in 2019 to 2,400,000 in 2020.

6.4 The overriding focus of the health and care system on tackling Covid-19 may well have impacted on broader health outcomes across communities and exacerbated existing health inequalities. As outlined in the [Director of Public Health Annual Report 2021](#), Covid-19 has highlighted inequalities. There is an overall gradient of increasing cases and deaths with increasing deprivation in addition to significant differences between ethnicities.

6.5 As well as the direct harms from the virus, there have been a wide range of indirect harms, and these too are not equally distributed across the population. The Covid-19 pandemic and the control measures to reduce transmission have impacted on almost all aspects of people's lives. This is having profound health, economic and social consequences, all of which will impact on mental health and wellbeing now and into the future. The Covid-19 Mental Health Needs Assessment for Plymouth 2021 indicates that before the pandemic across a variety of metrics mental health and wellbeing in Plymouth was generally in line with or worse than national rates. A Centre for Mental Health report predicts that as a direct result of the pandemic, up to 8.5 million adults in England (almost 20% of that population) will need either new or additional mental health support. The vast majority of these will be in people who have existing mental health conditions or the general population. In Plymouth these figures equate to almost 27,000 of the estimated 39,000 people with common mental disorders requiring additional support and over 17,000 from the general population

requiring new support for mainly moderate-severe depression or anxiety. Moreover, these impacts are experienced differently by different groups. There is a risk that the pandemic may increase and entrench mental health inequalities that existed and were widening before the pandemic. There are indications that the full impact of the pandemic on mental health are yet to be seen and this will need careful monitoring over the next few years.

6.6 As outlined in last year's report, the impacts of some of the measures to prevent the spread of Covid-19 are likely to have negatively impacted on the life chances of children and young people. Children and young people are one of the cohorts considered to be particularly vulnerable to increased mental health issues as a result of the pandemic. A potential increase in demand of around 77% for children and young people's mental health services has been estimated, across the range of need from emerging issues to more serious concerns. One significant impact of Covid-19 on the mental health needs of children and young people that is already being seen in data from Livewell Southwest is an increasing number of young people with an eating disorder. Plans are in place to address the rising demand for services however there is a risk that progress towards some of the policies within the Plymouth Plan could be affected.

6.7 In 2020 and 2021, academic testing within the Early Years was cancelled due to the Coronavirus pandemic and there is growing evidence that the pandemic has had a significant impact on the communication and language development of children from birth to five, which may affect long term learning and development unless the necessary support and interventions are secured. Anecdotally, speech and language services in Plymouth are seeing high levels of demand for services and also for assessments, such as those for autism for children, partly due to face to face services being halted for significant periods of time during the lockdowns.

6.8 Plymouth has also seen a rise in children entering the care of the local authority which can be directly attributed to the pandemic. The number of looked after children in the city has increased from 408 in 2014, to 436 in 2020 and then to 497 in January 2022. This has been linked to family breakdown for older children and concerns about the quality of parental care for younger children.

6.9 As outlined in [A Bright Future 2021-2026](#), the longer-term impact of Covid-19 on Plymouth's children and young people is yet to be fully known. For those children whose lives were already more difficult or risky, the legacy is likely to be significant, and detrimental. The full impact of this is not likely to be known for a few more years.

Climate emergency

6.10 On 18 March 2019, the City Council declared a climate emergency in recognition of the need for an urgent response from the global community to the threat of climate change, with a target of a net-zero city by 2030. Carbon neutrality is defined as the point when the city achieves a net zero carbon budget by getting as close to zero greenhouse gas emissions as possible by 2030, and then offsetting any residual emissions via other credible initiatives.

6.11 Following consultation and review in 2020, the Plymouth Plan was aligned with the ambition to become carbon neutral by 2030 and these changes were approved at a City Council meeting on 25 January 2021.

6.12 Plymouth aspires to be amongst the greenest and most sustainable places in Europe. It has been recognised as one of Forum for the Future's leading 'green' cities and has a strong reputation in promoting sustainable development. For example, in recent years Plymouth has almost doubled the area of land designated as Local Nature Reserves, supported 2,500 improvements in home energy efficiency, and launched a programme of work to establish the UK's first National Marine Park within Plymouth Sound.

6.13 Current and future progress towards achieving the city's climate change ambitions are measured through a series of Climate Emergency Action Plans. Plymouth's [Climate Emergency Action Plan 2022](#) contains over 100 realistic, achievable and deliverable actions that the city is committed to delivering during 2022. This is the third of 11 action plans that will be delivered by 2030. Progress on last year's Action Plan and details of key achievements can be found in the [Plymouth Climate Emergency Action Plan Progress Report July 2021](#) as outlined on pages 13 and 14, Plymouth's carbon emissions per capita have fallen steadily over the past 6 years, reducing from 4.4t tonnes of carbon dioxide equivalent (tCO₂e) in 2014 to 3.1 in 2020.

Cost of living

6.14 Partly due to the Covid pandemic and partly due to other factors such as the war in Ukraine, the cost of living has been increasing across the UK since early 2021¹. Inflation reached its highest recorded level in April 2022 and the ONS estimates that it is now higher than at any time since around 1982, affecting the affordability of goods and services for households. Energy prices are steadily increasing. From April 2021 to April 2022, domestic gas prices increased by 95% and domestic electricity prices by 54%. Another rise is forecast in October 2022. Food and road fuel prices are also on the rise with petrol currently achieving record weekly prices. Low-income and vulnerable households are forecast to be most affected by the rising cost of living. According to the Resolution Foundation, the poorest quarter of households are set to see their real incomes drop by 6% in 2022/23².

6.15 It is not possible to know whether the cost of living increases are fairly temporary or are set to continue in the longer-term. However, if household bills remain high, this is likely to have a sustained impact on the standard of living of some of the most vulnerable people in the city. This will undoubtedly exacerbate some of the city's pre-existing challenges and make some of the ambitions within the Plymouth Plan harder to achieve. Deprivation and poverty levels, which are higher than average in some parts of the city already, are likely to rise. More people in food and fuel poverty will mean that health and living conditions are likely to deteriorate for some of the city's residents. This negative effect on health and wellbeing could impact on life expectancy

1 Rising cost of living in the UK, House of Commons Library, May 2022

2 [Inflation Nation](#) • [Resolution Foundation](#)

and healthy life expectancy and may deepen existing health inequalities. Existing economic challenges such as lower than average wages and low productivity could worsen and local businesses may struggle to thrive. A reduction in disposable income could have a negative impact on the local economy. Continually increasing costs and rising inflation could impact on the delivery of major projects within the city such as those set to improve infrastructure or address the climate emergency which will in turn impact on the delivery of the Plymouth Plan objectives.

6.16 The city clearly faces significant challenge going forward however also has a number of strengths and robust plans for the future which will help to address some of these challenges. Plymouth has a positive local economic outlook and there is currently a strong demand for labour. Major projects planned for delivery over the next 5 to 10 years are forecast to have a positive impact on the local economy. These include the Plymouth and South Devon Freezone (Freeport) and wider port related potential, together with the National Marine Park which will play a significant role in the recovery of the visitor economy as well as having a number of other positive impacts. The next review of the Plymouth Plan, scheduled to take place in 2024, will need to take into account the likely effects of these changes and challenges. Consideration will need to be given as to how some of the long-term impacts can be managed effectively to keep progress on track.



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Cabinet



Date of meeting:	08 September 2022
Title of Report:	Plymouth and South West Devon Climate Emergency Planning Statement
Lead Member:	Councillor Rebecca Smith (Cabinet Member for Homes & Communities) Councillor James Stoneman (Cabinet Member for Climate Change)
Lead Strategic Director:	Anthony Payne (Strategic Director for Place)
Author:	Joanna Lee
Contact Email:	Joanna.lee@plymouth.gov.uk
Your Reference:	JL090825
Key Decision:	Yes
Confidentiality:	Part I - Official

Purpose of Report

The report seeks the Cabinet's support for the Plymouth and South West Devon Climate Emergency Planning Statement prior to its consideration by City Council for formal adoption at its meeting of 19 September 2022.

The Plymouth and South West Devon Climate Emergency Planning Statement has been produced in collaboration with South Hams District Council and West Devon Borough Council. Since the adoption of the Plymouth and South West Devon Joint Local Plan in March 2019, each Council has declared a Climate Emergency. The Plymouth and South West Devon Climate Emergency Planning Statement responds to the need for urgent action and provides interim policy and guidance on the climate emergency in advance of a formal review of the Plymouth and South West Devon Joint Local Plan.

The Climate Emergency Planning Statement has the legal planning status of 'interim policy statement', which is a policy tool that enables a local planning authority to put in place an interim policy pending the next review of its local plan. Interim policy statements do not have the status of a statutory development plan, and therefore carry less weight in the decision making process than local plans. However, they can nonetheless be important material considerations in planning decision making.

Once adopted it will set new mitigation and adaption requirements for new development and will be a material consideration in decision making.

Recommendations and Reasons

It is recommended that Cabinet support the Plymouth and South West Devon Climate Emergency Planning Statement and refer it to City Council for formal adoption as an interim policy statement, pending completion of the next review of the Plymouth and South West Devon Joint Local Plan.

REASON: To allow City Council to adopt it which will give formal weight to the Plymouth and South West Devon Climate Emergency Planning Statement as a material consideration in decision making on all new planning applications.

Alternative options considered and rejected

Alternatives considered include waiting for the formal review of the Plymouth and South West Devon Joint Local Plan to introduce new requirements and going much further by introducing full Future Homes/Building Standard requirements. Both these options were rejected because they either do not recognise the significance of the issue and importance of ensuring new buildings are fit for the future, or they go too far which at this stage cannot be justified.

Relevance to the Corporate Plan and/or the Plymouth Plan

‘A green, sustainable city that cares about the environment’ and ‘A Growing City’ – The Plymouth and South West Devon Climate Emergency Planning Statement will play an important role in supporting a low carbon economy, responding to the challenge of climate change and making Plymouth more resilient to its impact.

Implications for the Medium Term Financial Plan and Resource Implications:

No new resource implications arise from this report

Financial Risks

No new financial risks arise from this report

Carbon Footprint (Environmental) Implications:

The Plymouth and South West Devon Climate Emergency Planning Statement introduces measures for new development to reduce the carbon footprint so adopting this should have a positive impact on the carbon emissions.

This will be achieved through the requirement for new development to meet the most up to date building regulations and to go further achieving 20% improvement through onsite renewables, no new gas boilers, space for battery storage, use of resilient and low carbon building materials, priority for reuse and retrofit, increased capacity in EV charging, active and sustainable travel, encouraging passive solar design, protecting the soil resource, enhancing tree cover and green spaces, managing surface water and delivering 10% biodiversity net gain.

Other Implications: e.g. Health and Safety, Risk Management, Child Poverty:

** When considering these proposals members have a responsibility to ensure they give due regard to the Council's duty to promote equality of opportunity, eliminate unlawful discrimination and promote good relations between people who share protected characteristics under the Equalities Act and those who do not.*

A Sustainability and Equalities Impact Assessment was undertaken to inform the preparation of the Plymouth and South West Devon Climate Emergency Planning Statement. It concluded that it does not have any direct negative impacts on different groups, it seeks to ensure that new development delivers positive benefits and responds appropriately to the Climate Emergency we are facing.

There are no other implications

Appendices

**Add rows as required to box below*

Ref.	Title of Appendix	Exemption Paragraph Number (if applicable) <i>If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part 1 of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.</i>						
		1	2	3	4	5	6	7
A	Plymouth and South West Devon Climate Emergency Planning Statement – Adoption Briefing Note							
B	Plymouth and South West Devon Climate Emergency Planning Statement – Draft for Adoption							

Background papers:

*Add rows as required to box below

Please list all unpublished, background papers relevant to the decision in the table below. Background papers are unpublished works, relied on to a material extent in preparing the report, which disclose facts or matters on which the report or an important part of the work is based.

Title of any background paper(s)	Exemption Paragraph Number (if applicable) <i>If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part 1 of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.</i>						
	1	2	3	4	5	6	7
Climate Emergency Consultation Report							

Sign off:

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Originating Senior Leadership Team member: Paul Barnard (Service Director for Strategic Planning and Infrastructure)											
Please confirm the Strategic Director(s) has agreed the report? Yes											
Date agreed: 09/08/2022											

Cabinet Member approval:

Handwritten signature of J. R. Starema in black ink.Handwritten signature of R. Smith in black ink.

Date approved: 23/08/2022

PLYMOUTH AND SOUTH WEST DEVON CLIMATE EMERGENCY PLANNING STATEMENT - ADOPTION

Briefing Note

1. Introduction

- 1.1. In March 2019, Plymouth City Council declared a climate emergency and committed to net zero by 2030. Consequently, urgent action is required to make sure new development appropriately mitigates for and adapts to climate change. This will help ensure that new buildings do not need retrofitting as soon as they are built.
- 1.2. The Plymouth and South West Devon Climate Emergency Planning Statement is prepared as a response to the climate emergency. It puts in place interim policy and guidance pending the next review of the Plymouth and South West Devon Joint Local Plan (JLP). This allows us to go further than our adopted policies and guidance because of the urgent need to act now.

2. Background

- 2.1. The Plymouth and South West Devon Joint Local Plan (JLP) was adopted by Plymouth City Council, South Hams District Council and West Devon Borough Council in March 2019, before the climate emergency declarations. The Plymouth and South West Devon Supplementary Planning Document (SPD) amplifies adopted policy and was adopted in July 2020.
- 2.2. The JLP Partnership Board provides governance of the JLP and is made up of two cabinet members from Plymouth City Council, South Hams District Council and West Devon Borough Council. In December 2021, the Board agreed that urgent action was required to address the climate and biodiversity emergencies and that more should be done to go further than our current policies.
- 2.3. The JLP is not due for review until 2024 and must be undertaken according to regulations. This is a lengthy process and there are no options for quick updates and refreshes of local plans. However, use of an interim policy statement enables a local planning authority to proactively address an issue where there is a pressing need to take a different planning policy approach. This does not have the status of a statutory development plan would therefore carries less weight in the decision making process than local plans. However, it is an important material consideration in planning decision making.
- 2.4. The Board agreed that an interim policy statement should be prepared. A draft, entitled 'Plymouth and South West Devon Climate Emergency Planning Policy and Guidance' was presented to the Annual General Meeting in February 2022 and approved for a minimum 6-week consultation.

3. Consultation

- 3.1. Public consultation ran from 3 March 2022 to 5pm on 19 April 2022 in line with the agreed principles set out in the Statement of Community Involvement. It sought comments on the draft Plymouth and South West Devon Climate Emergency Planning Policy and Guidance document as well as the detailed mitigation and adaptation measures set out in a series of factsheets. Specific questions were asked seeking views and detailed information on a range of issues. A Sustainability and Equalities Impact Assessment was undertaken as part of the process and was published.

- 3.2. Over 1,800 comments were received from 128 individuals and organisations and a Consultation Report has been prepared providing more detail and is provided as a background paper. These comments were taken into account in finalising the planning statement.
- 3.3. The JLP Partnership Board has been fully briefed on the measures included within the Plymouth and South West Devon Climate Emergency Planning Statement, together with the Consultation Report and Climate Emergency Compliance Form and on 18 July 2022 agreed it should be progressed to the Full Councils of each Authority.

4. Structure and content of the Plymouth and South West Devon Climate Emergency Planning Statement

- 4.1. The Plymouth and South West Devon Climate Emergency Planning Statement is attached at Appendix B and is intended to be used by all members of the community, as well as those directly involved in the development industry.
- 4.2. It has been divided into the following sections:
 1. Introduction
 2. Why is this planning statement need and what is its status
 3. How the planning statement relates to local planning policy and guidance
 4. What the planning statement does and how it works
 5. How the planning statement will be delivered
 - 6-10 Appendices
- 4.3. Appendix 2 and 3 set out the new mitigation and adaptation requirements as follows:

Appendix 2 Mitigation Measures:

M1: Onsite renewable energy generation

M2: Energy Storage

M3: Low and zero carbon space and water heating systems

M4: Resilient and low carbon building materials

M5: Demolition and Rebuild

M6: Electric Vehicle Charging points

M7: Active and sustainable travel

Appendix 3 Adaptation Measures

A1: Passive Solar Design

A2: Protecting our soil resource

A3: Protecting and enhancing tree cover

A4: Protecting and enhancing gardens, green spaces and greenfield sites

A5: Delivering sustainable drainage, surface water management and restricting urban creep

A6: Delivering biodiversity net gain and habitat improvements

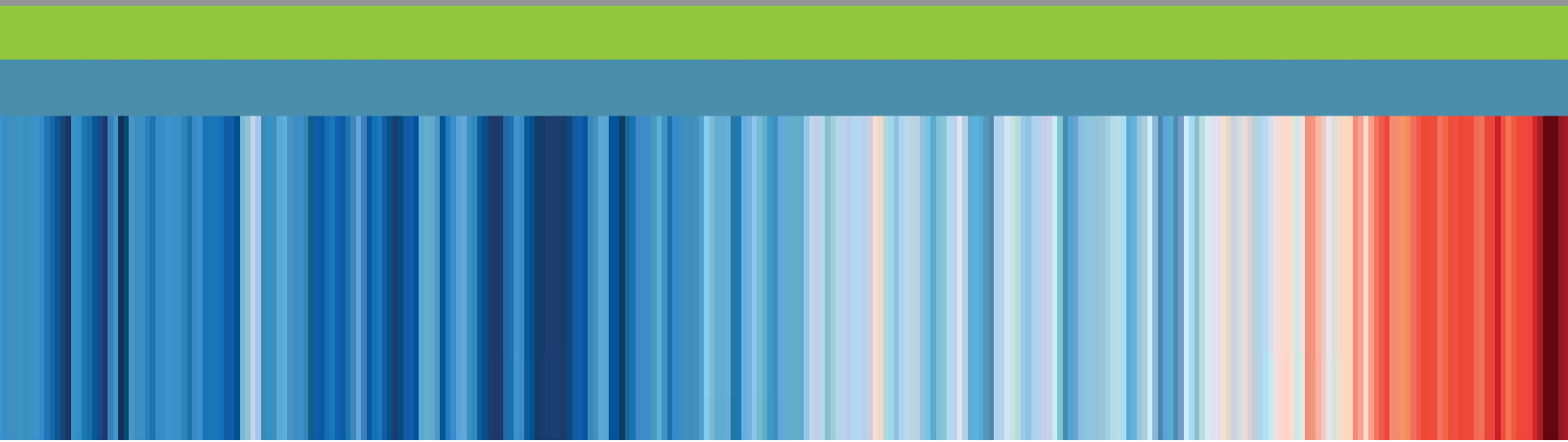
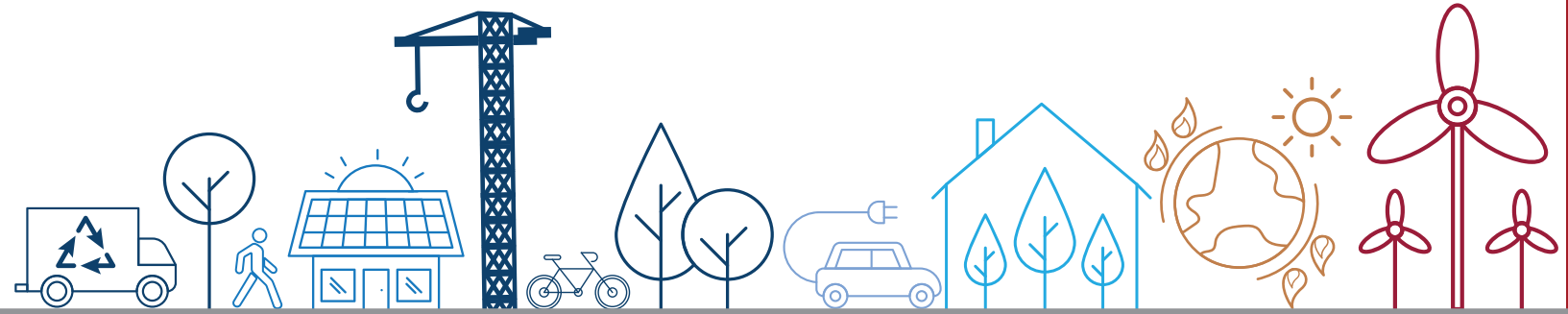
- 4.4. For ease of use, it has been primarily designed as an interactive web based tool that will direct people to the detailed mitigation measures required for residential and commercial development and the adaptation requirements for all development types.
- 4.5. It will be implemented using a Climate Emergency Compliance Form that all development proposals are required to complete in order for them to be validated. This will be added to the Local Validation Lists and can be delegated to the Cabinet Member for Homes and Communities.

5. Next steps

- 5.1. Following approval by Cabinet, the Plymouth and South West Devon Climate Emergency Planning Statement will be recommended for adoption by Full Council. The same will be done in South Hams Borough Council and West Devon District Council.
- 5.2. Once approved for adoption across all three JLP authorities the Plymouth and South West Devon Climate Emergency Planning Statement will come into force and be a material consideration in the determination of all new planning applications submitted after 30 September 2022.
- 5.3. It will apply only to new planning applications submitted after 30 September 2022 and will not be retrospectively applied to any planning applications already in the system at that point. Changes are being made to the local validations lists that will require all applications to complete a Climate Emergency Compliance Form in order to be validated. This will be agreed by the Cabinet Member for Homes and Communities.
- 5.4. The interactive webtool is being developed and will be made live on the website once this Climate Emergency Planning Statement has been adopted.

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PLYMOUTH AND SOUTH WEST DEVON CLIMATE EMERGENCY PLANNING STATEMENT



**ADOPTION DRAFT
SEPTEMBER 2022**



Plymouth and South West Devon Climate Emergency Planning Statement

1	Introduction	2
2	Why is this planning statement needed and what is its status	3
3	How the planning statement relates to local planning policy and guidance	4
4	What the planning statement does and how it works	6
5	How the planning statement will be delivered	9
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1 Introduction

1.1 The growing effects of climate change are having a significant impact on communities and there is clear evidence that we need to take action now. The way we use the planning system, together with Building Regulations, can make a major contribution to tackling climate change. It can help shape new developments and existing places in ways that minimise carbon emissions and positively support community resilience to climate impacts, such as increasing temperatures, rising sea levels, increased rainfall and extreme weather events.

1.2 This Climate Emergency Planning Statement responds directly to the Climate Emergency declarations issued across Plymouth and South West Devon and identifies exactly what all new development should do to meet the challenge of climate change. It builds on existing planning policies set out within the Plymouth and South West Devon Joint Local Plan and its supplementary planning document, embraces new standards and proposes new requirements. The mitigation and adaptation measures set out in this planning statement relate only to new development that requires planning permission. We recognise that there is work to be done to existing homes to ensure they are resilient to climate change, but retrofitting is a key issue that will need to be addressed outside the planning process.

1.3 This planning statement is deliberately ambitious and challenges the ‘business as normal’ approach. It intentionally suggests measures that look to the future, and encourages development that goes further than current Building Regulations. This includes providing for energy storage, understanding embodied carbon, using low and zero carbon space and water heating systems and requiring resilient and low carbon building materials.

1.4 The mitigation (preventing/reducing carbon emissions) and adaptation (adjusting to current/future effects of climate change) measures are set out in detail in Appendices 2 and 3, however they are best viewed using the interactive online tool on the website **here**. It explains what is expected and signposts to good practice and useful guidance about how it can be included within designs.

1.5 Consultation on the draft 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 and a range of views were expressed. Detail is available in the consultation report **here**. These comments have been taken into account in finalising the document. The measures contained in the planning statement balance the need for early action with the constraints of what can be required now. This begins a discussion about climate emergency planning policy that will continue and evolve as the Joint Local Plan is reviewed.

1.6 A glossary of all the terms used is set out in Appendix 5.

2 Why is this planning statement needed and what is its status

2.1 The Plymouth and South West Devon Joint Local Plan (JLP) provides a sound policy basis for the Local Planning Authorities to begin to tackle the impacts of climate change. However, we recognise that the knowledge, evidence and expertise surrounding climate change and its impacts is continually evolving. In the last 3 years following the adoption of the JLP, there have been a number of significant changes that have elevated the importance of addressing the climate challenge. This includes commitments made at the United Nations Climate Change Conference COP26 (Glasgow Autumn 2021), changes to national legislation and policy and relevant planning appeal decisions (summarised in Appendix 1).

2.2 Each council made Climate Emergency declarations in 2019⁽¹⁾ committing themselves to aiming for net zero by 2030, with further detail on how they intend to achieve this set out in climate emergency action plans⁽²⁾. South Hams District Council and West Devon Borough Council have also declared biodiversity emergencies. Taken together, these changes create an increased urgency for more radical action.

2.3 This planning statement does not change the status of the JLP, which remains the adopted development plan for the area and the starting point for decision making. This planning statement has the status of an interim policy statement and guidance and therefore must be taken into account when determining a planning application. This is a recognised approach, as set out in the National Planning Policy Guidance in relation to First Homes.⁽³⁾, that enables us to put in place interim policy pending the next review of the JLP. As such, it is a new material consideration in the development management process.

1 Plymouth City Council Full Council 18 March 2019, South Hams District Council Executive 6 June 2019, West Devon Borough Council full council 21 May 2019

2 South Hams: [Action Plan and Activity | SH Climate Change \(southhams.gov.uk\)](https://www.southhams.gov.uk/action-plan-and-activity-sh-climate-change), Plymouth: [Climate Emergency Action Plan 202](https://www.plymouth.gov.uk/climate-emergency-action-plan-202), West Devon: [Action Plan and Activity | WD Climate Change \(westdevon.gov.uk\)](https://www.westdevon.gov.uk/action-plan-and-activity-wd-climate-change)

3 NPPG Paragraph: 009 Reference ID: 70-009-20210524.

3 How the planning statement relates to local planning policy and guidance

3.1 All new development is assessed against local planning policy and guidance as set out in the:

- Plymouth and South West Devon Joint Local Plan adopted in March 2019; and the
- Plymouth and South West Devon Supplementary Planning Document (SPD) adopted in June 2020.

3.2 The new measures within this planning statement are consistent with the adopted strategic objectives and policies within the JLP, and expand on the additional guidance in the adopted SPD. These documents work together in the pursuit of sustainable development in the JLP area.

3.3 JLP Strategic Objective SO11 Delivering high quality development already expects development to respond positively to the challenges of climate change, reducing carbon emissions and creating communities that are more resilient. Alongside this the strategic policies set the framework for growth based on the delivery of sustainable development:

- SPT1 Delivering sustainable development
- SPT2 Sustainable linked neighbourhoods and sustainable rural communities
- SPT9 Strategic principles for transport planning and strategy
- SPT10 Balanced transport strategy for growth and healthy and sustainable communities.

3.4 Collectively the JLP policies seek to deliver sustainable development of the right quality in the right location. This planning statement uses and reinforces the existing policies in the JLP that seek to deliver development which positively responds to the climate challenge. These policies collectively provide the hooks for this new planning statement.

3.5 Policy 'DEV32 Delivering low carbon development' already sets out a very progressive approach and is used alongside other adopted policies and allocations to achieve climate change mitigation, adaptation and resilience. Whilst applications are considered against the JLP as a whole the following policies are of particular relevance:

- PLY6 Improving Plymouth's city centre
- PLY20 Managing and enhancing Plymouth's waterfront
- PLY37 Strategic Infrastructure measures for the City Centre and Waterfront Growth Area
- DEV1 Protecting health and amenity
- DEV2 Air, water, soil, noise, land and light
- DEV10 Delivering high quality housing
- DEV15 Supporting the rural economy
- DEV16 Providing retail and town centre uses in appropriate locations
- DEV20 Place shaping and the quality of the built environment
- DEV23 Landscape character
- DEV25 Nationally protected landscapes
- DEV26 Protecting and enhancing biodiversity and geological conservation

- DEV28 Trees, woodlands and hedgerows
- DEV29 Specific provisions relating to transport
- DEV33 Renewable and low carbon energy (including heat)
- DEV34 Community energy
- DEV35 Managing flood risk and water quality impacts
- DEV36 Coastal Change Management Areas

3.6 To support the JLP policies the SPD contains considerable detailed planning guidance explaining how the policies work and what is required to comply with them. In relation to policy 'DEV32 Delivering low carbon development' the SPD sets out the application requirements, promotes the reuse and recycling of building materials, explains the dangers of overheating, seeks the delivery of on site renewable energy generation to achieve regulated carbon emissions levels of 20% less than that required by the Building Regulation part L ⁽⁴⁾, identifies exactly what Energy Statements and Solar Masterplans should cover, explains the energy hierarchy and signposts to useful resources.

3.7 There are also numerous other parts of the SPD that are highly relevant to delivering a positive response to the climate challenge. This includes requirements for travel plans and electric vehicle charging as well as delivering resilient development with biodiversity net gain, sustainable drainage systems, flood management, district heat networks, green space, trees, woodlands and hedgerows.

4 [Conservation of fuel and power: Approved Document L - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

4 What the planning statement does and how it works

4.1 The requirements and guidance set out in this planning statement aim to deliver the following Strategic Objective.

CES01 Strategic Objective

Delivering positive measures to address the climate emergency

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

- ***Ensuring resilience by providing positive benefits that reduce carbon***
- ***Increasing renewable energy generation***
- ***Improving energy efficiency***
- ***Using sustainable local materials and minimising embodied carbon***
- ***Prioritising the retrofitting of existing buildings and reuse of materials***
- ***Reducing reliance on fossil fuels***
- ***Embracing electric vehicles and their charging infrastructure***
- ***Increasing walking, cycling and public transport opportunities***
- ***Reducing waste and increasing recycling***
- ***Effective use of solar gain, solar cooling and shading***
- ***Delivering biodiversity net gain and using nature based solutions***
- ***Managing flood risk, improving sustainable drainage and minimising impermeable surfaces***

4.2 This planning statement sets out a range of new requirements for all types and scales of development. It is split into two parts; mitigation measures and adaptation measures which are detailed in Appendices 2 and 3.

4.3 A simple web based tool has been developed to help applicants understand what is required of new development to meet the expectations of the climate emergency and ensure it is fit for the future.

4.4 ***Click here for the user-friendly tool.***

4.5 All those seeking planning permission for new development should give proactive consideration to the implications of the climate emergency on their development at the beginning of the scoping and design stage. By working with developers, the opportunity exists to reduce the contribution to climate change from development and maximise climate change mitigation, adaptation and resilience. We want to achieve this by incorporating measures that reduce the impact, such as the emission of greenhouse gases, and adjust to the current and future effects of climate change.

4.6 In most instances, the requirements are consistent with the emerging Future Homes/Building Standard⁽⁵⁾ that have now been incorporated into Building Regulations and came into force for applications made on or after 15 June 2022. Applications made prior to June 15, will be assessed against the previous standards providing substantial building work has begun before 15 June 2023 on all aspects of the application. This planning statement twin tracks these improved standards so they can also be properly considered in the planning system to ensure issues such as orientation are considered at the right stage of the process. However, given the scale of the emergency and the need for urgent action it also introduces some additional requirements, summarised below and set out in detail in Appendices 2 and 3.

4.7 We welcome and encourage proposals from developers that want to go further and be more ambitious, for example delivering carbon negative buildings.

Mitigation measures

4.8 The primary aim of the mitigation measures is to reduce the amount of carbon emitted through the development process. The proposals set an intentionally high bar in terms of demonstrating how carbon reduction permeates all aspects of a development scheme. The mitigation measures are set out in detail in Appendix 2 and include:

- The need for improved energy efficiency through ensuring the building minimises energy use, increasing on-site renewable energy generation, incorporating energy storage and maximising passive energy capture. This could help reduce the impact of volatile energy prices by promoting low and zero carbon space and water heating systems that do not use gas or oil boilers.
- Increased emphasis on sustainable, durable, recycled materials of UK or European origin in the construction process by introducing a hierarchy of acceptability and proof of provenance for roof slates and stone.
- Prioritising the re-use of buildings, rather than the demolition and replacement, and ensuring embodied carbon is a consideration in the planning process.
- Providing for Electric Vehicle charging facilities.
- Reducing the need to travel and avoiding development that locks in reliance on the private car, in favour of increasing sustainable transport options including the provision of adequate charging facilities for electric car and bikes as well as mobility hubs.

Adaptation Measures

4.9 Adaptation to the impacts and effects of climate change can often be overlooked in favour of mitigation measures to reduce the carbon impact of development. Effective adaptation is an important part of ensuring resilient development and delivering places that respond to the impacts of the climate emergency, in turn helps reduce carbon emissions.

5 [The Future Homes Standard: changes to Part L and Part F of the Building Regulations for new dwellings](#) and <https://www.gov.uk/government/consultations/the-future-buildings-standard>

4.10 The policies of the JLP and existing guidance in the SPD provides considerable detail on how development should include measures to ensure the building and its wider site is adaptable to climate change. In many instances, the solutions and opportunities are interconnected and the design should consider these holistically, using nature based solutions to maximise the benefits and deliver buildings and greenspace that positively mitigate and adapt to the challenge of climate change.

4.11 All development should consider how the development adapts to a changing climate. This means positively:

- Incorporating passive solar design
- Protecting our soil resource
- Protecting hedges and trees, especially mature trees that have significant value, and enhancing tree cover in the right places
- Protecting and enhancing gardens, green spaces and greenfield sites
- Delivering sustainable drainage and surface water management, reducing flood risk and urban creep
- Delivering at least 10% biodiversity net gain and habitat improvements

4.12 The inclusion of positive adaptation measures within development schemes will be a material consideration in the decision making process.

4.13 Biodiversity net gain is a key area where policy and practice is evolving with the introduction of provisions set out in the Environment Act. The JLP policy 'DEV26 Protecting and enhancing biodiversity and geological conservation' states that net gains in biodiversity will be sought from all major development proposals, and a 10% increase in biodiversity units will be compliant with this policy. This will be measured using the most up to date Biodiversity Metric. A proportionate approach will be taken for small-scale development. Additional detailed guidance on biodiversity net gain will be produced to assist developers and applicants with the use of the new biodiversity metrics, habitat banking and costs.

4.14 To complement the current policies and recognise the importance of adaptation measures on the environment a new Green Space Factor tool will be produced. This will ensure the multifunctional benefits of green and blue spaces are prioritised and recognise the role they play in maintaining our health and wellbeing. Further work is required to develop this tool, set appropriate thresholds and understand how it could be used to complement the approach on biodiversity net gain particularly on small sites. We will bring this forward separately as part of any biodiversity net gain guidance.

5 How the planning statement will be delivered

5.1 Planning applications submitted after the 30 September 2022 (when this planning statement is adopted) will need to meet the requirements set out in this planning statement and will have to complete a Climate Emergency Compliance Form to demonstrate how they will meet each of the mitigation requirements and deliver adaptation measures in their proposals. This will ensure applicants can explain exactly which document, plan, or drawing, demonstrates evidence of compliance. The measures could be included in:

- Energy Statement/Strategy
- Design and Access Statement
- Sustainability Statement
- Sustainable Travel Plan
- Energy Performance Certificate
- Standard Assessment Procedure (SAP) or
- specifically indicated on plans, drawings or other compliance reports.

5.2 The completion of the Climate Emergency Compliance Form will be included in the validation process and within the Local Validation Lists.

5.3 All mitigation and adaptation measures identified should be integrated into the design and layouts of developments and will be subject to control through building regulations and/or planning conditions. In some cases it will be necessary to secure delivery and management through the use of a S106 planning obligation. Developers and house builders should factor these requirements into their land purchases and will be expected to clearly demonstrate how they are being met, either through compliance with new building regulations or condition.

5.4 It is recognised that there may be some exceptional circumstances when it may not be possible to meet all the mitigation and adaptation requirements of this planning statement. Therefore if the requirements are not met in full proposals to mitigate the impact of non-compliance must be set out. In these cases, where it is demonstrably not possible to meet these requirements, a contribution to offset carbon emissions may be sought by the relevant Local Planning Authority, consistent with policy DEV32.3. Where a financial contribution commensurate with the direct carbon impact of the development is proposed, in line with policy DEL1 and paragraph 9.3 of the SPD, calculations should use the [GLA Carbon Offset Funds guidance](#) or updated version. All contributions will be secured by Section 106 agreements and allocated by the Local Planning Authorities to local offsetting schemes.

5.5 New development schemes are likely to be subject to additional costs, which could have an impact on development viability in some locations. However, the direction of travel towards low carbon and carbon neutral development has now been set for many years, and developers should be expected to factor these costs into their land valuation and profit expectations. The climate emergency is too important an issue for the entirety of humanity to continue with development that only serves to exacerbate the problem and leave significant retrofit costs for the future. The impact on viability will be considered on a case by case basis and difficult decisions about the balance of priorities may be necessary.

6 Appendix 1 Detailed justification for the Climate Emergency Planning Statement

National Policy and Legislation

6.1 The core purpose of the planning system is to create places which enable people to live happy and healthy lives, it is not possible to achieve this without considering the impact of climate change and addressing this through adaptation and mitigation. The UK has set ambitious targets for reducing greenhouse gas emissions and in all four UK nations there is law or policy requiring local planning authorities to consider and take action on mitigating and adapting to climate change. The planning system is set by and subject to a number of pieces of national legislation and regulation. This section identifies the most relevant legislation demonstrating the need for urgent action and justifying the priority to be given to climate change through this planning statement.

6.2 The Climate Change Act 2008 (amended in 2019) requires a 100% reduction in greenhouse gas emissions by 2050 (compared to 1990 levels). This is known as the net zero target. In June 2021 the Government adopted the sixth carbon budget⁽⁶⁾ that sets out a more ambitious target of 68% reduction by 2030.

6.3 The Planning and Compulsory Purchase Act 2004 sets out the current structure of the local planning framework for England and Wales, including the duty on plan-making to mitigate and adapt to climate change. Local planning authorities are bound by the legal duty set out in Section 19 of the Planning and Compulsory Purchase Act 2004, as amended by the Planning Act 2008, to ensure that, taken as whole, plan policy contributes to the mitigation of, and adaptation to, climate change.

6.4 The Flood and Water Management Act 2010 addresses the threats of flooding and water scarcity. Under the Flood Risk Regulations 2009, the Environment Agency is responsible for managing flood risk from main rivers, the sea, and reservoirs. Lead local flood authorities (LLFAs) are responsible for local sources of flood risk, in particular surface water run-off, groundwater, and ordinary watercourses. LLFAs are statutory consultees on major development. Local authorities are responsible for ensuring that requirements for preliminary flood risk assessments are met.

6.5 The Planning and Energy Act 2008 sets out powers for local authorities to require a proportion of the energy need related to new development to be sourced in the locality of the development, through renewable or low-carbon generation. It also sets out powers for local planning authorities to set energy efficiency standards that exceed the energy requirements of the Building Regulations. There has been much discussion about whether LPAs can continue to set their own requirements and in January 2021 the Government responded to the consultation on the Future Homes Standards by stating 'To provide some certainty in the immediate term, the Government will not amend the Planning & Energy Act 2008, which means that local planning authorities will retain powers to set local energy efficiency standards for new homes.'

6 The Carbon Budget Order 2021 (SI 2021/750)

6.6 The NPPF sets out the key national planning priorities for England. It was updated in 2021. It is non-statutory guidance, but is a powerful material consideration in plan-making and development management decisions. The NPPF is accompanied by online Planning Practice Guidance. Paragraph 152 of the NPPF underlines that the planning system should support the transition to a low-carbon future in a changing climate, taking full account of flood risk and coastal change. Paragraph 153 makes clear that local planning authorities are expected to adopt proactive strategies to mitigate and adapt to climate change, in line with the Climate Change Act 2008. Since compliance with national law and policy is central to the soundness test carried out on local development plans, compliance with the Climate Change Act is a clear obligation on both the Planning Inspectorate and local planning authorities.

6.7 The National Planning Policy Framework (NPPF)⁽⁷⁾ was amended in July 2021 to include reference to the United Nations Sustainable Development Goals. These are set out below.



6.8 This means there is a duty to deliver development that contributes positively to goal 11 Sustainable Cities and Communities, and goal 13 Climate Action. While more is needed to enshrine the climate emergency within the NPPF, paragraph 8 identifies the opportunity to secure net gain and requires a positive approach to ‘mitigating and adapting to climate change, including moving to a low carbon economy’. It also includes a chapter on meeting the challenge of climate change, flooding and coastal change, and within that is a requirement to help ‘shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience’.

6.9 The Planning Practice Guidance (PPG) online resource provides vital additional and detailed guidance on aspects of the NPPF, and it is periodically updated to include interpretations of Ministerial Statements relevant to planning. The critical sections of PPG are on ‘Climate change’, ‘Renewable and low carbon energy’, and ‘Flood risk and coastal change’. Paragraph 011 of the ‘Climate change’ section directs planners to the Climate Change Committee for further information and guidance. In recent years, significant changes

7 NPPF 2021 para 8c

have been made to the viability test that is applied to plan policy and particular applications. Paragraph 002 of the PPG section on viability and plan making now states that ‘the price paid for land is not a relevant justification for failing to accord with relevant policies in the plan.’

6.10 On 14th July 2021 the Government published their Transport Decarbonisation Plan that sets out the pathway to net zero transport in the UK⁽⁸⁾.

6.11 The National Model Design Code⁽⁹⁾ published on 20th July 2021 requires codes to cover “sustainability including energy efficiency, net zero alignment and climate resilience”. This reflects the National Design Guide that sets out the ten characteristics of a well-designed place that need to positively address environmental issues affecting climate.

6.12 On 19th October 2021 the Government published its Net Zero Strategy: Building Back Greener and its Heat and Buildings Strategy⁽¹⁰⁾. This contained a raft of commitments including ensuring the reformed planning system supports efforts to combat climate change. Key elements include retiring the internal combustion engine by banning petrol and diesel cars from 2030, phasing out the installation of new and replacement gas boilers by 2035, introducing interim Future Homes Standards from June 2022 and reviewing the NPPF. The Government intends to publish an electric vehicle infrastructure strategy later this year and the latest announcement⁽¹¹⁾ sets out that all new homes and buildings will be required by law to install electric vehicle charging points from the middle of 2022.

6.13 The recent Housing, Communities and Local Government Select Committee Report⁽¹²⁾ requires action to deliver its Net Zero Strategy. This includes giving net zero a central role in the NPPF and bringing forward Future Homes Standard legislation as soon as possible. The Government response to this, published on 13th January 2022 commits to accelerating the legislation to introduce the full Future Homes Standard in 2024.

6.14 The Environment Act received royal assent on 9th November 2021. It provides increasing emphasis on the sustainable use of resources and the importance of nature in addressing the climate emergency. It sets out new requirements for waste, water, local nature recovery and expects all new developments to deliver a ten per cent biodiversity net gain managed for at least 30 years.

6.15 On 15th December 2021 the Government announced new building regulations⁽¹³⁾ that will help deliver net zero through a number of measures including requiring new homes to produce 30% less carbon emissions and bringing in more EV charging. These standards came into force on 15th June 2022.

8 <https://www.gov.uk/government/publications/transport-decarbonisation-plan>

9 [National Model Design Code: Part 1 - The Coding Process \(publishing.service.gov.uk\)](#)

10 M Government, [Net Zero Strategy: Building Back Greener](#). (October 2021); [HM Government, Heat and Buildings Strategy](#), (October 2021)

11 21st November 2021 <https://www.bbc.co.uk/news/business-59369715>

12 [Fifth Report published 29th October 2021 Local government and the path to net zero - Committees - UK Parliament](#)

13 [New homes to produce nearly a third less carbon - GOV.UK \(www.gov.uk\)](#)

6.16 On 17th January 2022 the Government published the UK Climate Change Risk Assessment 2022⁽¹⁴⁾ which identifies 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. It states that ‘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’.

6.17 On 2nd February 2022 the Government published its Levelling Up White Paper⁽¹⁵⁾ which supports the decarbonisation agenda and recognises changes to the planning system are needed to support the transition to net zero.

6.18 On the 11th May 2022 the Government published the Levelling Up and Regeneration Bill. The Bill seeks to improve the planning process so it can

- deliver high quality design and beautiful places, and protect our heritage
- enable the right infrastructure to come forward where it is needed
- enhance local democracy and engagement
- foster better environmental outcomes
- allow neighbourhoods to shape their surroundings, as this is where the impact of planning is most immediately felt

6.19 The Bill will also enable further changes to come forward which will enhance the way that planning works, including full digitalisation of the system, improving planning processes and the preparation of National Development Management Policies. It is currently not clear what will be included within these policies but it is likely that they will contain guidelines to help deliver the Government's Net Zero Agenda.

Case law and recent planning appeals

6.20 Legal judgements made by judges in the courts and planning appeal decisions are made by planning inspectors and provide a useful interpretation of planning policy. They are increasingly recognising the climate emergency as a significant material consideration in decision making.

6.21 Climate change as a whole, and the impact of embodied carbon in particular, are clearly material planning considerations in light of the relevant case law on the meaning of “material planning considerations”: *R(Wright) v Resilient Energy Severndale Ltd and Forest of Dean Council* [2019] UKSC 53, [2019] 1 WLR 6562 at §§39-42 and *R(Samuel Smith Old Brewery) v North Yorkshire CC* [2020] UKSC 3, [2020] PTSR 221 at §§31-32. 8. The fact that a local authority has declared a climate emergency is also a material planning consideration, which was confirmed in 2020 by the Planning Inspectorate in a decision under section 78 of the Town and Country Planning Act 1990: appeal APP/Y2620/W/15/3134132 at §§86-89.

14 [UK Climate Change Risk Assessment 2022 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

15 [Levelling Up White Paper \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

6.22 In April 2021 the Secretary of State recognised that ‘the scale and urgency of the climate change emergency is such that tackling climate change is a material consideration to which significant weight should be attached’⁽¹⁶⁾. In November 2021 in an appeal in Dartmouth the Inspector explicitly referred to the issue of climate change as one where planning policy may not be quite keeping pace with development elsewhere. In his decision letter⁽¹⁷⁾ he states ‘*My site visit took place on the third day of the Cop26 climate conference in Glasgow where the need for urgent action was once again made crystal clear by the Prime Minister. The recent initiatives such as those mentioned above are therefore a material consideration which I believe should carry some weight. It seems to me folly to build new houses now that will commit the owners to potentially expensive and disruptive alterations as the UK moves to decarbonise the heating of its housing stock.*’

Stakeholder and developer statements

6.23 The Department for Environment, Food and Rural Affairs is the lead department for domestic climate adaptation, but across government actions and policies are being implemented. Adaptation is also embedded in other key government commitments such as the 25 Year Environment Plan. The climate emergency requires everyone involved in the built environment to take responsibility for climate resilience and therefore all stakeholders and developers are increasingly setting out how they can adapt their plans and programmes in response. Set out below are a number of examples:

6.24 The Environment Agency’s strategy⁽¹⁸⁾ is about living better with a changing climate and designing today for tomorrow’s climate. Their aim is to create a net zero nation that is resilient to climate change.

6.25 Natural England’s vision for thriving nature for people and planet is at the heart of their action plan⁽¹⁹⁾. The natural environment can play an important role in tackling the climate crisis as healthy ecosystems take up and store a significant amount of carbon in soils, sediments and vegetation. The Carbon Storage by Habitat report provides detailed information and support for nature-based solutions for net zero⁽²⁰⁾.

6.26 National Highways have set out a plan⁽²¹⁾ to 2050 for net zero highways and are investing in energy storage systems to support electric vehicle (EV) drivers.

16 APP/V2255/W/19/3233606 Secretary of State decision. Appeal by Quinn Estates Ltd and Mulberry Estates (Sittingbourne) Ltd against Swale Borough Council.

17 APP/K1128/X/20/3252613, APP/K1128/W/20/3252623. Appeal by Mr David Holloway against South Hams District Council.

18 Living better with a changing climate - [Climate Adaptation and Reporting Third Round: Climate Emergency](#)

19 [Natural England action plan 2021 to 2022](#)

20 <http://publications.naturalengland.org.uk/publication/5419124441481216>

21 <https://nationalhighways.co.uk/netzerohighways/>

6.27 The Town and Country Planning Association (TCPA) and Royal Town Planning Institute (RTPI) explores ways local authorities and communities can make a real difference and conclude that ‘The threat of climate change is real, and time is running dangerously short. A resilient and sustainable future is achievable, but only if we act now’⁽²²⁾.

6.28 House builders and Commercial organisations are also committed to addressing climate change. Persimmon’s Annual report 2020⁽²³⁾ identifies climate change action and resilience as the single most important material issues to be addressed and have set targets aligned to the UN Sustainable Development Goals. This includes the ‘aim to be net zero carbon for our homes in use by 2030 and in our operations by 2040 and 50% of our homes will be built using timber frames from our off-site manufacturing facilities by 2025’.

6.29 Taylor Wimpey in their 2020 Annual Report⁽²⁴⁾ explicitly identify climate change as one of their priorities recognising it as ‘the most significant global environmental threat and we are determined to play our part in tackling it’. This has translated into setting targets and recognising the need to purchase land that factors in the new costs associated with the Future Homes Standard and EV charging regulations.

6.30 The Planning Practice Guidance is very clear that it is the responsibility of site promoters to engage in plan making, take into account any costs including their own profit expectations and risks, and ensure that proposals for development are fully compliant with up to date plan policies. Decisions on applications will be considered against the adopted and emerging policies. The price paid for land is not a relevant justification for failing to accord with policies in the plan. Landowners and site purchasers should consider this when agreeing land transactions⁽²⁵⁾.

22 TCPA/RTPI, The Climate Crisis – a guide for planning authorities on planning for climate change, October 2021 <https://www.tcpa.org.uk/planning-for-climate-change>

23 [persimmon_ar2020_web_bmarks-final.pdf](#)

24 [Annual Report and Accounts 2020](#) □ Taylor Wimpey

25 NPPG Paragraph: 002 Reference ID: 10-002-20190509

7 Appendix 2 Mitigation measures



M1 – Onsite renewable energy generation

7.1 For major and minor planning applications, adopted JLP policy DEV32.5 will apply in order to secure an equivalent 20% carbon saving through onsite renewable energy generation.

7.2 The baseline ‘target emissions rate’ (TER) will be calculated using the most up-to-date version of SAP10 (or other versions of SAP should SAP10 be superseded) to ensure that the latest carbon factors are used to create both a robust baseline for the proposal, and to calculate the most accurate carbon savings from renewable energy generation.

7.3 Extensions that benefit from favourable conditions to support roof mounted PV, and where the host building does not already generate renewable energy onsite, should include a rooftop PV system of a minimum installed capacity of 1Kwp.

7.4 Generating renewable energy onsite improves energy resilience and reduces fuel prices for occupiers. Onsite energy generation will also help reduce energy demand from the national grid, allowing more energy to be used to support the transition to electric vehicles and heat pumps, both of which are important elements of the UK decarbonisation strategy.

7.5 Building Regulation Approved Document Part L has been updated in December 2021 and introduced in June 2022, and this introduces higher standards of thermal efficiency for buildings. As such, it is appropriate to ensure that the DEV32.5 20% carbon reduction requirement is only secured through onsite renewable energy generation, with no mechanism to count alternative savings through a fabric first approach, as this has already been incorporated into the 2021 Part L uplift.

7.6 Favourable conditions for extensions include no overshadowing of the proposed roof, with the roof having an easterly, southerly or westerly aspect. A 1Kwp is likely to comprise of at least 4 PV panels.

7.7 Further information is available: [Approved Document Part L 2021](#), [Energy Saving Trust guide to solar panels](#) and [The Renewable Energy Hub](#)

M2 – Energy storage

7.8 New development proposals should identify on submitted floor plans an area close to the main circuit board that could accommodate a battery storage system capable of meeting at least 50% of the daily energy demand of the building, unless this is technically unfeasible, or incompatible with the technological requirements of a specific battery.

7.9 Battery storage enables buildings to better use energy that is generated onsite, or purchased at favourable tariffs overnight when demand is low. The use of battery storage as part of smart system has benefits on the grid, as it reduces demand at peak times, and allows users to be more resilient to power outages, as well as paying less for the energy they consume.

7.10 Batteries can be floor or wall mounted, and space needs to be identified that allows for suitable access and maintenance arrangements. Although a battery storage system does not need to be located next to a mains circuit board or solar PV inverter, it does make for a less intrusive installation process for the occupier.

7.11 If suitable space next to the mains circuit board cannot be accommodated, alternative spaces will be considered that are compatible with the technical requirements of a specific product or system.

7.12 Further information is available: [Energy Saving Trust guide to battery storage](#)

M3 – Low and zero carbon space and water heating systems

7.13 All minor and major development proposals should be served by low or zero carbon space and water heating and where relevant cooling systems, with an emphasis on ground, air and water source heat pumps. Other options for low carbon heating systems include solar thermal/ solar thermodynamic/ or solar PVT systems or biomass in rural areas.

7.14 Buildings served by district energy systems for heating and cooling will be considered to meet the requirements of the policy, providing the fuel used within the district energy network is low or zero carbon. Proposals that meet the prescribed characteristics in the SPD, and/or are in a defined area for district energy potential will need to connect to an existing heat network, where this exists, be future-proofed for connection to a future heat network or provide analysis and justification for why they cannot connect to a heat network.

7.15 In order to meet binding legislative carbon reduction targets, the UK needs to rapidly decarbonise all aspects of societal behaviour. Reducing reliance on fossil fuels is the single biggest action that will contribute to rapid decarbonisation. For many, this will result in the installation of a heat pump, although other systems may also meet the wider policy aims, such as biomass boilers, solar thermal heating, micro hydro-electricity or mini combined heat and power systems.

7.16 Hydrogen based systems are not considered compatible with the aims of this policy, as the fuel is not proven at scale for domestic or commercial buildings, and only 'green' energy is low or zero carbon, with grey or blue hydrogen being formed from fossil fuels.

7.17 Further information is available: [The Renewable Energy Hub](#) and [Micro Certification Scheme](#)

M4 – Resilient and low carbon building materials

7.18 Slate used on all new buildings with pitched roofs and natural stone used for paving must accord with the hierarchy of origin as well as meeting the requirements to be compatible with local vernacular and design:

- 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

7.19 All new roof slates and natural stone must be covered by a minimum warranty period of 50 years.

7.20 The number and type of materials used to construct a building is extensive, and the planning process rarely seeks to influence materials used in construction except where there may be an issue of visual impact. However, as well considering the colour and tone of certain materials, DEV32.1 requires us to reduce the wider environmental impact of building materials, and this requirement is rarely considered or conditioned.

7.21 Many building materials are increasingly accompanied by information that quantifies not only the origin of the product, but also the environmental impact. Where possible, a product should be obtained that has an Environmental Product Declaration (EPD). If an EPD is not available, a verifiable certificate of origin or provenance will need to be supplied.

7.22 Further information is available: [Environmental Product Declaration](#)

M5 – Demolition and rebuild

7.23 Priority will be given to the reuse and retrofitting of buildings. Where an existing building is proposed to be demolished and rebuilt, the net overall carbon cost of the project should be offset within 25 years through carbon savings achieved by operational use of the replacement building.

7.24 The JLP policies Dev 31 and DEV32.1 advocate reuse, recycling and resource minimisation through the development process. In 2019 the Architects Journal launched their RetroFirst campaign, that seeks to ensure that our existing buildings in the UK are only demolished and replaced as a last resort, and where retrofitting is proven to be not technically feasible. However, we recognise that there are some circumstances when demolition may be necessary.

7.25 The age of a building is not in itself justification for demolishing it. Old windows can be replaced, insulation added either internally or externally, roofs replaced with more resilient and lower impact materials. Air tightness can be greatly improved by combining external interventions, with particular focus on the reinstatement of doors and window. A comprehensive approach to improving air tightness through whole-building retrofit will also allow for a suitable ventilation system to be designed and incorporated.

7.26 A project wide assessment of the net carbon impact of the development proposal will form the basis of how much energy needs to be saved through operational efficiencies. Further detail is available in [Architects Journal RetroFirst](#) and [RICS whole life carbon assessment for the built environment](#) and set out below:

Further information

The baseline for this assessment will be the target emissions rate as derived from building regulations Part L, using the most up-to-date SAP software, with savings calculated using the difference between the TER and the dwelling emissions rate (DER, for domestic buildings) or building emissions rate (BER, for non-domestic buildings).

Embodied carbon calculations for existing and proposed dwellings should be submitted in full using software that complies with RICS whole life carbon assessment principles.

Justification for demolition will only be considered acceptable under the following circumstances;

1. The building is structurally unsafe and is in a condition that cannot be safely remediated as part of a comprehensive retrofit; or,
2. The demolition and rebuild will result in significant social and environmental benefits, such as large scale regeneration, and affordable-housing led development proposals

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

M6 – Electric Vehicle Charging Points

7.27 Domestic charging points will be installed in accordance with 2021 Building Regulations Approved Document Part S, which will need to be demonstrated as part of the planning application.

7.28 The quantity of charging points for non-domestic development will also need accord with 2021 Approved Document Part S. The minimum installed capacity for each charging point will be;

- **Class E – 22kw**
- **All other non-domestic development – 11kw**

7.29 Electric vehicles represent an opportunity to reduce reliance on fossil fuels, and will contribute to decarbonising transport emissions across the UK as part of the Government's Transport Decarbonisation Plan. To ensure that the transition to electric vehicles is achieved at a trajectory that secures adequate levels of emissions savings, charging infrastructure must be available and accessible in all new developments.

7.30 Whilst switching fuels in private and commercial vehicles has a clear role to play in decarbonising transport, it should not be confused with the greater benefits that can be achieved by reducing the need to travel in the first place, and increasing the number of journeys by sustainable and active modes of travel.

7.31 Further information is here:[Approved Document Part S 2021](#)

M7 – Active and Sustainable Travel

7.32 All new buildings must incorporate measures to encourage use of active and sustainable travel options and should avoid locking-in reliance on the private car.

7.33 Minor development proposals should be guided by the requirements of the adopted policies 'SPT10 Balanced transport strategy for growth and healthy and sustainable communities', 'SPT12.9 Strategic approach to the natural environment', 'DEV15 Supporting the rural economy' and 'DEV29 Specific provisions relating to transport', as well as the associated sections of the SPD.

7.34 Major developments will need to include an assessment of sustainable and active travel opportunities and constraints in their Design and Access Statement (DAS). This should identify what benefits are being proposed as part of the development highlighting how these benefits will achieve modal shift within and beyond the proposed development.

7.35 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 identifying 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.

7.36 The location of new development should continue to be considered against the adopted spatial strategy set out in the JLP and specifically policies 'SPT1 Delivering sustainable development', 'SPT2 Sustainable linked neighbourhoods and sustainable rural communities' and 'TTV1 Prioritising growth through a hierarchy of sustainable settlements' and 'TTV2 Delivering sustainable development in the Thriving Towns and Villages Policy Area'. Switching to EV is not a substitute for sound placemaking based around the core principles of reducing

the need to travel and maximising the use of sustainable and active travel modes. 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 accord with paragraph 104 of the National Planning Policy Framework.

7.37 Government policy is increasingly supportive of locating development in the most sustainable places and designing development to facilitate modal shift to active travel ([see LTN1/20: Cycle Infrastructure Design](#); [Gear Change: A bold vision for cycling and walking](#)) and bus service ([Bus Back Better: National Bus Strategy for England](#)). Further information is also available at: [Planning and Net Zero Transport](#)

8 Appendix 3 Adaptation measures



8.1 The JLP policies and SPD already include numerous requirements to ensure our communities are both resilient and adaptable to the impacts of climate change. Strategic Objective 'SO11.6 delivering high quality development' within the JLP explicitly requires development to respond positively to the challenges of climate change, reducing carbon and creating communities that are more resilient.

8.2 Given the importance adaptation plays in climate change, it is essential that all schemes are designed to include positive adaptation measures. In all applications additional consideration and increased emphasis will be given to the following adaptation requirements in the decision making process because of their importance in capturing carbon and providing more resilience of extreme weather events.

A1 – Passive Solar Design

8.3 All development is required to :

- **be compliant with 2021 Building Regulations Approved Document Part O – Overheating, and provide a copy of the Part O Compliance Checklist (Appendix B) as part of their planning application**
- **incorporate sound design principles that take every opportunity to incorporate passive solar gain in line with SPD guidance.**

8.4 Approved document Part O – Overheating applies to all new buildings and extensions, and includes specific window to floor ratios that need to be adhered to in each elevation. The checklist is a summary document that collates all of the room and window data into a concise format.

8.5 The benefit of this information at planning application stage is that it can be amended during the consideration of the application. This is preferable to identifying and issue at the inspection stage as to rectify any issues then is likely to result in resubmission of planning information and expensive reconstruction of the building.

8.6 The opportunities for maximising the cooling benefits of planting should not be restricted to areas surrounding a building, but also within the fabric of the building itself. As global temperatures rise we will need to look at whole systems approaches to reducing the risk of overheating, not just in the design and orientation of buildings themselves, but through managing the relationship between buildings and their surroundings. Green walls and roofs offer significant potential to reduce the risk of overheating, whilst also benefitting biodiversity and habitat creation. All proposals should therefore demonstrate what additional adaptation measures are included to reduce the risk of overheating.

8.7 Further guidance on green walls and roofs will be made available.

A2. Protecting our soil resource

8.8 The JLP prioritises the development of previously developed land and promotes resilient development and policy DEV2.6 gives further detail on protecting soils. Because of the importance our soil resource plays in carbon storage the plan seeks to protect greenfield sites unless allocated or there is a need for the development.

8.9 Soils support biodiversity, sequester carbon and absorb water and play an important role in capturing carbon, providing sustainable drainage, as well as increasing resilience to extreme weather event. The loss of soil cover to impermeable surfaces has numerous detrimental impacts which erode their important role in addressing the climate emergency.

8.10 **The Climate Emergency Compliance Form should include measures to protect the soil resource.**

A3. Protecting and enhancing tree cover

8.11 JLP policy DEV28 protects trees, woodlands and hedgerows, require net gain and appropriate mitigation. Trees are crucial in delivering a wide range of adaptation benefits and for helping to maintain our health and wellbeing; for example spending time around trees and looking at trees can reduce stress, lower blood pressure, and improve mood.

8.12 Trees play a vital role in addressing the climate emergency through their storage of carbon, reducing run off, increasing drainage, shade and improving air quality, as well as addressing local climatic effects and reducing energy demand. Trees also support a huge amount of habitats and species. Tree planting at a massive scale is a key component of the

government plan to net zero. Existing trees, especially mature trees that have significant value should be protected and development should provide enhanced tree cover with the right new trees in the right places.

8.13 The Climate Emergency Compliance Form should include measures to protect and enhance tree cover and to address their important role in the climate emergency.

A4. Protecting and enhancing gardens, green spaces and greenfield sites

8.14 JLP policy ‘SPT1 Delivering sustainable development’ and ‘SPT2 Sustainable linked neighbourhoods and sustainable rural communities’ prioritise the re-use of previously developed sites reducing the need for greenfield development. This in turn helps protect natural assets and promotes the creation of a wildlife rich local environment with well designed public and natural spaces. These key strategic policies, along with other policies in the JLP collectively promote resilient development and the efficient use of land protecting and enhancing gardens, green spaces and greenfield sites.

8.15 Green spaces and green fields sites have an intrinsic value as a natural resource that makes a significant contribution to addressing the climate emergency. They offer a wide range of existing multifunctional benefits. These include as a soil resource, which provides an important role in capturing carbon, and providing increased resilience to extreme weather events through managing drainage and surface water. As well as making a positive contribution to climate change adaptation they are an important source of biodiversity and habitats as well as playing an important role in maintaining our health and wellbeing. This includes delivering opportunities for food production that reduces food miles and grocery costs, growing food protects the soil, creates habitats, manages water run-off and helps reduce the risk of overheating.

8.16 The Climate Emergency Compliance Form should demonstrate how the benefits and functions of all green spaces will be protected and enhanced.

A5. Delivering sustainable drainage, surface water management and restricting urban creep

8.17 Being able to absorb water through permeable surfaces reduces the need to manage water offsite, which in turn reduces the risk of flooding. Urban creep is the gradual paving of porous surfaces and leads to an increased need to manage surface water. Good water management onsite will also assist in supporting biodiversity and habitats, as well as reducing the risk of overheating.

8.18 Specific rules apply for householders wanting to pave over their front gardens. You will not need planning permission if a new or replacement driveway of any size uses permeable (or porous) surfacing which allows water to drain through, such as gravel, permeable concrete block paving or porous asphalt, or if the rainwater is directed to a lawn or border to drain naturally. However, if the surface to be covered is more than five square metres planning permission is required for laying traditional, impermeable driveways that do not provide for the water to run to a permeable area.

8.19 The Climate Emergency Compliance Form should demonstrate how surface water will be managed to ensure sustainable water drainage and reduced flood risk.

A6. Delivering biodiversity net gain and habitat improvements

8.20 JLP policy 'DEV26 Protecting and enhancing biodiversity and geological conservation' requires 10% biodiversity net gain in all major development, a proportionate approach to minor development and enhancements for wildlife from all scales of development. The SPD provides detailed guidance including provision for 30-year maintenance and acknowledges that there will be a new Biodiversity Metric and updated guidance will be required. The Environment Act increases the importance of this issue and makes 10% biodiversity net gain mandatory.

8.21 Biodiversity and habitats are hugely significant to personal health and wellbeing, supporting ecosystems, enhancing ecology, capturing and storing carbon capture and encouraging food production. The RSPB reports that the UK ranks in the bottom 12% of countries globally for biodiversity intactness, and has lost 60% of our habitats since 1970.

8.22 New guidance will be produced on biodiversity net gain including habitat banking and costs. In addition, a Green Space Factor Tool will be produced and consulted on separately.

8.23 The Climate Emergency Compliance Form should demonstrate how appropriate levels of biodiversity net gain will be achieved.

9 Appendix 4 Impact assessment

9.1 The Climate Emergency Planning Statement was assessed during its preparation against sustainability objectives and a supporting Impact Assessment Document was published alongside the consultation version.

9.2 This assessment also began to consider climate justice and how climate change can impact on different groups, however it did not attempt to provide a comprehensive assessment of this but only considered the small impact the document would have. As the Planning Statement will only apply to new development, submitted after 30 September 2022, its impact will be limited to new dwellings and extensions and other development requiring permission.

9.3 Moving forward the Councils recognise the importance of working closely with health authorities and emergency services to plan how to deal with potential emergencies such as storms, heat waves, extreme cold, further pandemics, floods, water or food shortages, wildfires, extreme air pollution, pest invasions, and associated mental health issues.

9.4 We recognise that climate change impacts differently on people and communities and their capacity to adapt will depend on different factors including:

- Personal features of the individual, such as age and health, which affect their sensitivity to climate impacts;
- Environmental characteristics, such as the availability of green space, quality of housing stock or elevation of buildings, which can increase or offset exposure to flooding or heat;
- Social and institutional context, such as levels of inequality and income, the strength of social networks, the cohesion of neighbourhoods and the day-to-day practices of institutions, such as care regimes in nursing homes, which affect people's ability to adapt.

9.5 There will be variations in how communities respond to the risks of climate change and some groups of people such as those with physical or mental health problems, care home residents, people who misuse alcohol, the homeless, the socially isolated, children, the elderly, the disabled, and people of low income can experience different levels of vulnerability to climate change impacts.

9.6 Understanding the full impacts of climate change on the JLP area will form part of the evidence to support any update or review of the Joint Local Plan in the future. In the period before the review/update of the JLP, the measures set out in the document will help ensure that new developments are responding to climate change. This will have direct impacts for those who are living within the properties or use services and facilities that have adapted or mitigated for climate change.

9.7 There might also be some secondary benefits for our communities, for example flood risk to existing development could be reduced as a result of contributions towards flood risk management schemes. Measures which seek to enhance green space and urban cooling measures, including nature based solutions, have the potential to reduce urban temperatures.

These secondary benefits are consistent with National Planning Policy Framework aims to wherever possible help reduce flood risk overall and provide wider sustainability benefits to the community

9.8 This planning statement seeks to improve the resilience of future development and its ability to adapt to climate change and raises awareness about climate change and how the Councils are responding. In terms of Equalities Impact Assessment, it does not have any direct negative impacts on different groups, it seeks to ensure that new development delivers positive benefits and responds appropriately to the Climate Emergency we are facing.

10 Appendix 5: Glossary

Active Travel

Active travel simply means making journeys in physically active ways - like walking, wheeling (using a wheelchair or mobility aid), cycling, or scooting.

Adaptation

Climate change adaptation is the process of adjusting to current or expected climate change and its effects. It is one of the ways to respond to climate change, along with mitigation.

Air Source Heat Pump

An air source heat pump is a renewable heating system that extracts low-temperature solar energy from the air and compresses this energy into a higher temperature. An air source heat pump provides a building with 100% of its heating and hot water all year round.

Biodiversity

The numbers and relative abundances of different genes (genetic diversity), species, and ecosystems (communities) in a particular area.

Biomass boiler

A heating system that uses natural/non-fossil fuel resources to create heat for use throughout a home or premises.

Brise Soleil

Brise soleil (taken from the French for 'sun breaker') is a type of solar shading system that uses a series of horizontal or vertical blades to control the amount of sunlight and solar heat that enters a building.

Carbon footprint

The amount of carbon an entity of any type (e.g., person, group, vehicle, event, building, corporation) emits into the atmosphere.

Carbon sink

Anything storing carbon such as trees and other vegetation, forests, oceans and grasslands.

Eaves

The area where a roof extends a small way past the wall of a building is usually referred to as the eaves. Extending the eaves can assist with increasing shade at times when the sun is at its highest.

Ecosystem

A system of interacting living organisms together with their physical environment. The boundaries of what could be called an ecosystem are somewhat arbitrary, depending on the focus of interest or study. Thus, the extent of an ecosystem may range from very small spatial scales to, ultimately, the entire Earth.

Emissions

In the climate change context, emissions refer to the release of greenhouse gases (primarily carbon) into the atmosphere over a specified area and period of time.

Embodied carbon

Embodied carbon is the total greenhouse gas (GHG) emissions (often simplified to “carbon”) generated to produce a built asset. This includes emissions caused by extraction, manufacture/processing, transportation and assembly of every product and element in an asset.

Extension

An addition to an existing building that, for the purposes of this document, requires planning permission

Fossil fuels

Carbon-based fuels from fossil carbon deposits, including coal, oil, and natural gas.

Future Building Standard (FBS)

The aim of the Future Buildings Standard is to improve the energy efficiency and sustainability of new and renovated buildings other than new dwellings, which are covered by the Future Homes Standard.

Future Homes Standard (FHS)

The Future Homes Standard is a set of standards that will complement the Building Regulations to ensure new homes built from 2025 will produce 75-80% less carbon emissions than homes delivered under current regulations. Interim standards were introduced from 15 June 2022.

Green Roof

A green roof is a layer of vegetation planted over a waterproofing system that is installed on top of a flat or slightly-sloped roof. Plants help to reduce overheating, retain water and increase biodiversity and habitats.

Green Walls

A green wall is a vertical built structure intentionally covered by vegetation. Plants help to reduce overheating, retain water and increase biodiversity and habitats.

Ground Source Heat Pump

A ground source heat pump is a renewable heating system that extracts low-temperature solar energy stored in the ground or water using buried pipework and compresses this energy into a higher temperature. A ground source heat pump provides a building with 100% of its heating and hot water all year round.

Habitat

The particular environment or place where an organism or species tend to live; a more locally circumscribed portion of the total environment.

Major Development

For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more.

For non-residential development it means additional floorspace of 1,000m² or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Minor development

A minor development is anything below the threshold for major developments. For example: the number of dwellings is between one and nine, or the floorspace is less than 1,000sqm or the site area less than one hectare.

Mitigation

Climate change mitigation consists of actions to limit global warming and its related effects. This involves reductions in human emissions of greenhouse gases as well as activities that reduce their concentration in the atmosphere. It is one of the ways to respond to climate change, along with adaptation.

Offsetting

A carbon offset is a reduction or removal of emissions of carbon dioxide or other greenhouse gases made in order to compensate for emissions made elsewhere. Offsets are measured in tonnes of carbon dioxide-equivalent. Carbon offsetting is just one tool in our toolbox to tackle climate change and should not be considered as a stand-alone action. Organisations and individuals should look to reduce their emissions as much as possible, as well as taking responsibility for what remains, by offsetting it.

Photo Voltaic (PV) Panels

PV panels, also known as solar panels, capture the sun's energy and convert it into electricity.

Renewable Energy

Energy obtained from natural sources such as geothermal, wind, photovoltaic, solar, and biomass. The harvesting and use of this energy resource does not result in additional carbon being emitted into the atmosphere.

Solar PVT

A combination of solar photo voltaic panels and solar thermal panels in one module and produces electricity and heat simultaneously.

Solar thermal

System that uses energy from the sun to warm water for storage in a hot water cylinder or thermal store.

Solar thermodynamic

A flat plate collector which gains energy from the sun as well as the ambient air.

Standard Assessment Procedure (SAP)

A SAP assessment is the only government approved method for calculating the energy performance of dwellings. These can be done at a design stage, which forecasts the energy performance of a dwelling, and also 'as built' which calculates the actual energy performance of the constructed building.

Sustainable Transport

Sustainable transportation is the capacity to support the mobility needs of a society in a manner that is the least damageable to the environment and does not impair the mobility needs of future generations. The most sustainable forms of transport often move multiple people between fixed points, in the UK buses and trains are considered the most sustainable of mainstream transport modes. These can be made more sustainable by using renewable and low carbon fuels.

Thermal efficiency

Is a measure of how well a building uses energy for space heating. A higher level of energy efficiency means that a building uses less energy than a building of an equivalent size, (reducing energy waste) because less energy is lost through the fabric of the building.



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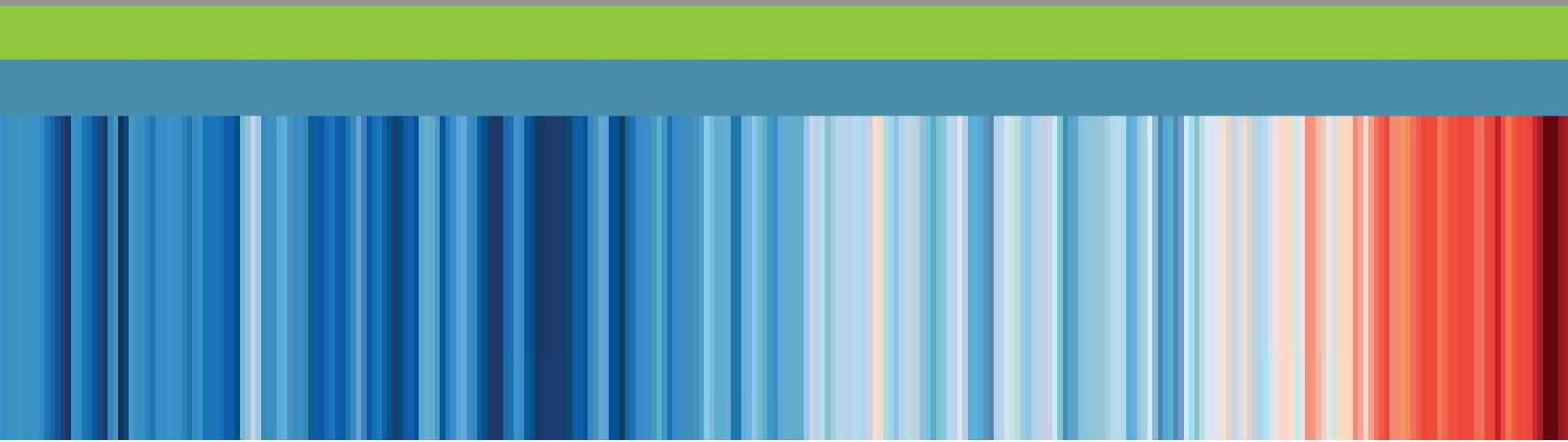
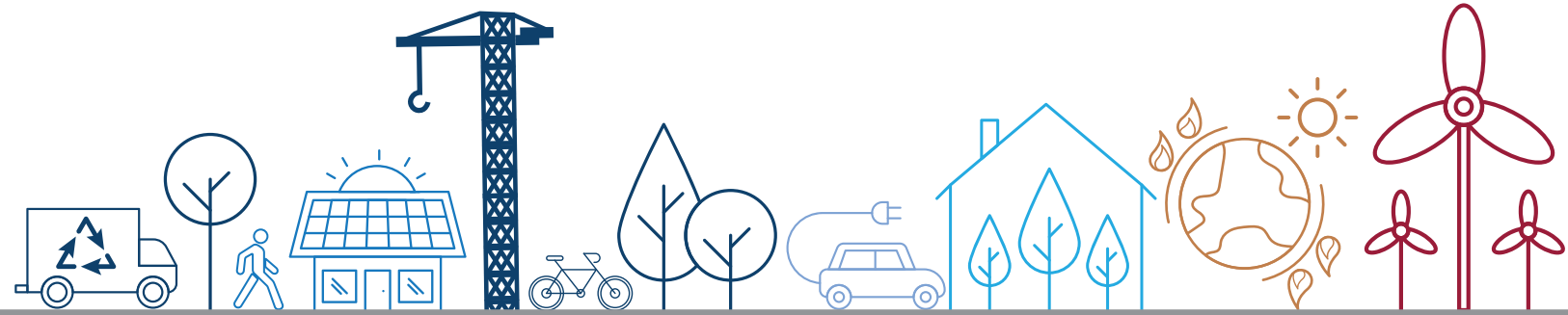


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CLIMATE EMERGENCY PLANNING POLICY & GUIDANCE



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

- **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.

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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.

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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:

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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](#)

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[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.

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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.

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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

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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.

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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.

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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.

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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**

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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.

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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

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- 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

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Appendix 2: Summary and scale of issues raised



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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.

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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.



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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,

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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.

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	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.

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	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.

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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.

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	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

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	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,

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	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				

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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.

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	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.

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