

**CEPPG Explanatory Text – to be put into factsheets by development type for the consultation process**

**MITIGATION**

**MI. Thermal efficiency**

Improving the thermal efficiency of buildings is an important part of reducing heat loss and the amount of energy used.

For new homes, we will continue to apply the adopted JLP requirement of a 20% uplift over 2013 Building Regulations (Part L) until such time that Future Homes Standard (FHS) 2022 standards that require a 30% uplift are required through building regulations.

**For commercial development, we require an uplift for thermal efficiency in commercial buildings of 27% over Part L. This was the Governments preferred uplift as set out in the Future Building Standard (FBS) consultation in 2020.**

In order to monitor performance, two Standard Assessment Procedure (SAP) assessments will need to be submitted for each dwelling. SAP is the methodology used by the government to assess and compare the energy and environmental performance of dwellings. The first will comprise an ‘as designed’ SAP based on the design and schedule of materials and products, the second will comprise as ‘as built’ SAP that is based upon the actual construction. This ensures that the specification provided at the start of the project is delivered, and mitigates for operational deficiencies as a result of materials or products being substituted during construction.

What is required for commercial developments:

As part of the application	As designed SAP assessment showing improved fabric efficiency that is 27% above 2013 Part L requirements.
To discharge the condition	As built SAP supplied to confirm the specification of the completed building meets the minimum 27% above 2013 Part L

**Should we fast track this Future Building Standard requirement of 27% now?**

**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?**

**Should air tightness testing be required to ensure that thermal efficiency standards are met?**

**M2. Roof mounted solar photovoltaic (pv) panels**

Increasing the amount of energy generated onsite by roof mounted solar PV panels helps to reduce the amount of energy required by each building from the grid, and contributes to decarbonising our electricity supply.

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

Including this requirement within a planning policy will ensure that roof plans submitted as part of the application process will show the location and scale of the roof mounted pv system. It will also

allow for consideration of orientation and design to maximise a favourable aspect, which will benefit passive solar gain and access to natural light.

**For commercial and appropriate other development, we will require a minimum of 40% of the roof space to include roof mounted solar pv panels.** Commercial roof space provide a particularly good opportunity to play a prominent role in accommodating solar pv. The UK solar strategy (2015) identified a clear role for commercial roof space to accommodate medium to large scale pv arrays.

**Where possible, householder extensions should also be seeking to maximise the amount of roof space for solar PV, with the array being a minimum 40% of the extension footprint, unless the host building already benefits from a roof mounted pv array.**

What is required for relevant applications:

As part of the application	Roof plan showing location of roof mounted solar pv system for each building Details of the installed capacity of pv system and any additional low carbon or renewable technology within the DAS.
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**Do you agree that a general minimum 40% requirement should apply to commercial buildings?**

**What measure should be used for this requirement – 40% of building footplate or 40% of roof space?**

**Should there be different standards for different types of uses?**

**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?**

**Should this requirement also apply to extensions with favourable aspect?**

**Should this requirement also apply to extensions on listed buildings and heritage assets?**

**M3. Energy storage**

There are obvious benefits in terms of easing pressure on the local grid by combining renewable energy generation with onsite battery storage. This will allow for smarter use of the energy being generated onsite, and in some cases will result in buildings requiring no electricity from the grid for large parts of the year.

Domestic scale battery storage is still an emerging technology, and is relatively expensive, although this is likely to change with increased incentives designed to accelerate renewable generation, and with FHS requiring more roof mounted pv at the point of construction.

Whilst it may be too early to make this a requirement, it seems logical to ensure that there is sufficient space identified adjacent to the fuseboard to enable retrofit of battery storage in the future.

**All development with solar pv should identify a suitable space to accommodate a battery.** This space should be shown on a layout plan, with dimensions of a minimum 1sqm of floor area, and at least 1.5m height. It should also be confirmed that the floor area is able to accommodate to weight of up to 200kg common in larger domestic batteries.

What is required for applications with solar pv:

As part of the application	Floor plan to show required area for battery storage unit
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**Does this go far enough? Should we be requiring all new buildings with onsite energy generation to include a battery storage system?**

**M4. Heat pumps**

The Government have set an ambition to phase out gas boilers by 2035. The Future Homes Standard (FHS) transitional requirements are encouraging the use of heat pumps and ensuring new systems can be easily fitted with heat pumps at the earliest opportunity. Home heating is responsible for around 14% of the UKs carbon emissions and domestic gas usage is the second largest contributor to carbon emissions across the JLP area. Energy prices are volatile and rising dramatically and heat pumps are a good way to enable reduced energy bills and tackle climate change. Consequently, we will not support new gas connections.

Western Power are providing all new development with three phase electricity, consequently there are unlikely to be capacity problems. However, there may be current capacity issues in certain situations. Where this is the case evidence should be provided from Western Power Distribution (WPD).

**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.**

If a heat pump cannot be installed during construction due to limitations within the local grid, the heating system should be designed in such a way as to enable an easy retrofit to heat pumps when the grid can support it. This means underfloor heating and low heat radiators, thus incentivising the retrofit to heat pumps at a suitable time of the occupier.

What is required for all applications:

As part of the application	Demonstrate through Statement of Compliance
To discharge the condition	As built SAP will include details of the installed heating system

**Should we restrict all new gas and oil connections?**

**Do you foresee any difficulties in delivering this?**

**Should we be prioritising ground source heat pumps over air source heat pumps on developments at a certain scale with favourable conditions, and if so, what should that threshold be?**

**If there is an additional cost required by WPD to upgrade the local grid, how much is considered ‘reasonable’?**

**M5. Passive solar gain and managing the risk of overheating**

This measure seeks to capture the benefits of the sun, but must prevent overheating and is an area where understanding the balance of considerations is important. Making the most of a southerly

aspect makes good sense in terms of access to natural light, and benefitting from passive solar gain. However, with evidence of global temperatures warming, and in particular extremes of high heat forecast to be more prevalent, we need to be mindful of managing the risk of overheating, that can be reduced by good design and layout.

For major developments the SPD already requires Solar Master Plans. This informs the layout and design of the development to ensure that solar gain and access to natural daylight have been optimised. The SPD also includes guidance on orientation and layout to maximise passive solar gain. However, we can do more reduce overheating.

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

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.

Further guidance on green walls and roofs is currently being prepared and will be made available

What is required for all relevant applications:

As part of the application	Demonstrate through Statement of Compliance
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**Do you agree that passive solar gain already adequately covered by guidance in the SPD? If not what else is required?**

**Are there other specific measures that we should include to reduce the risk of overheating?**

## **M6. Locally sourced materials**

Policies DEV10 and DEV20 of the JLP and SPD (page 219 and Appendix 2 in particular) already recognise the multiple benefits of using sustainable, durable and locally sourced building materials.

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 consider the wider environmental impact of building materials, and this requirement is rarely considered or conditioned. One of the materials we often condition in terms of visual acceptance is roof slates, and whilst the visual appearance of some slates may be similar, the environmental impact of mining and transportation can vary greatly.

There are a wide range of natural roof slates available within the UK that have a much smaller environmental impact when compared to slates from countries such as, but not exclusively to, Brazil and China. Transportation from these countries typically results in ten times the carbon emissions created by UK or European products. Brazilian and Chinese slates are also often cheaper than UK

or European equivalent products, but typically come with a reduced warranty of as little as 20 or 30 years, which only compounds the environmental impact as they will need to be replaced two or three times during the life of a building.

**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**

Where necessary this will be secured by condition by the development management case officer.

What is required for all relevant applications:

As part of the application	Schedule of provenance of proposed slates.
To discharge the condition	Provide certification from supplier of the number and origin of slates used within the construction

**Do you agree we should ensure the use of more environmentally friendly, low carbon materials in all development?**

**Are there more effective ways of doing this?**

**Should we extend this requirement to other natural products such as stone where these are required within a development?**

**Should we require a minimum warranty period as well as proof of origin?**

**What evidence, if any, should we require of compliance?**

## **M7. Principle of net gain**

Applications for extensions, conversions and other changes of use that do not need building regulations consent, provide the opportunity to improve the energy efficiency of the whole building. These proposals should deliver a measurable net gain in energy performance. This will be in the form of an uplift in the Energy Performance Certificate (EPC) for the building. It may be that the extension itself generates enough benefit to improve the EPC for the overall building, or it may be that additional benefits are required to achieve a minimum one band uplift.

Most dwellings and buildings should have a baseline EPC already. For those that do not yet have an EPC, an assessor should be instructed to provide an assessment as a baseline for the proposal. Any buildings that have not yet achieved a minimum band C will be required to achieve a minimum one band uplift as part of the process to extend an existing dwelling or building. In order to demonstrate compliance, an EPC will need to be provided before and after construction to show that net gain has been achieved.

What is required for relevant applications:

As part of the application	A valid EPC for the host building (no older than 10 years)
To discharge the condition	A new EPC showing a minimum one band uplift

**Do you agree we should seek to achieve a net gain in energy efficiency from extensions, conversions and changes of use?**

**Is the EPC the right measure of net gain?**

**What other measures can we use to demonstrate net gain?**

**Should there be exceptions to this approach?**

**How do we ensure that net gain is also achieved on listed buildings and heritage assets?**

**Should the planning application specify the measures that will generate the uplift?**

### **M8 Demolitions and replacement buildings**

We recognise that demolition is permitted development and does not need planning permission. However, the loss of embodied energy from demolishing existing structures and replacing them with new buildings represents a significant potential risk to meeting our carbon reduction targets. As such, the local planning authorities consider demolition is an important material consideration in the decision making process and advocate retrofitting and extending existing buildings instead of demolition and rebuild.

Particularly at pre-app, applicants are encouraged to consider reusing existing buildings onsite, although there may be a number of reasons why some structures are demolished. It may not be viable to retain them, or they may not be structurally capable of being brought into effective use, and under these circumstances we will apply the additional requirement set out below to ensure any loss of embodied carbon is offset through the energy efficiency of the new building.

If an existing building is proposed to be demolished as part of a planning application, the developer will need to calculate the embodied energy within the structure, and ensure that the net carbon cost (minus carbon saved through reuse and recycle) can be offset within 25 years of onsite operational use of the replacement building. The baseline for this assessment will be the target emissions rate as derived from building regulations Part L. No offsite mitigation will count towards offsetting. A number of tools/software are available that can calculate embodied carbon. To assist with this the Councils' are considering offering developers' access to a carbon calculator software package through its own licence arrangements for a fee.

We are proposing using the Standard Assessment Procedure (SAP) as the tool to assess whether a replacement dwelling can effectively offset the loss of embodied carbon from the building that it has replaced. SAP is the methodology used by the government to assess and compare the energy and environmental performance of dwellings.

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.

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

What is required for applications requiring demolition:

As part of the application if demolition of an existing structure forms part of a proposal	<ul style="list-style-type: none"><li>• Structural assessment of the existing building – is it fit to be retrofit?</li></ul>
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	<ul style="list-style-type: none"> <li>• Calculation of embodied carbon contained within the existing structure using an appropriate software or other tool. Full schedule of volume of materials that will be reused and recycled providing a net figure for embodied carbon of demolished structure</li> <li>• Calculation of embodied carbon of replacement structure?</li> <li>• Net overall carbon cost of new dwelling</li> <li>• As designed SAP assessment of the proposal</li> <li>• Evaluation of how long the net carbon cost of the demolition will take to be offset by energy savings in operational use</li> </ul>
To discharge the pre-commencement condition	<ul style="list-style-type: none"> <li>• Proof of reused and recycled materials, in the form of a construction statement (architect or construction contractor) confirming materials and amounts of reused material from the previous structure. Goods received documentation from recycling facilities</li> <li>• As built SAP to demonstrate that no alternative materials have been substituted through the construction process that would lead to greater carbon emissions from the completed building</li> </ul>

**Do you think we should prioritise reuse and offset any loss of embodied carbon?**

**Is there a better approach? Should we consider an article 4 direction requiring prior approval?**

**If we are going to offset embodied carbon is 25 years the right offset period? If not, what alternative should be used?**

**There is a variety of life carbon assessment tools available to calculate embodied carbon. Do you recommend any particular one?**

**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?**

**Should we require airtightness tests in addition to as built SAP assessment to demonstrate compliance?**

### **M9. Electric Vehicle (EV) charging points**

Electric vehicles form one part of the strategy to reduce carbon emissions from transportation to net zero. In order to enable more EVs to be charged within new developments, we will continue to apply our adopted requirements contained within JLP policy DEV29 and SPD (see paras 3.83-3.89). [PSWD JLP Supplementary Planning Document \(plymouth.gov.uk\)](https://www.plymouth.gov.uk/pswd-jlp-supplementary-planning-document). Going forward we may also want to consider opportunities for charging facilities for water transport.

In addition, we are clarifying what is required in the following scenarios:

**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.**

What is required for all relevant applications:

As part of the application	Plan to show EV charging points (including charging capacity) for all buildings
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**Should we be requiring a higher charging capacity in communal parking areas?**

**Should commercial chargers be higher than 22kw?**

**Should we apply a threshold at which commercial development is required to install 22kw?**

**Should we be increasing the requirement to 50kw chargers for parking areas that serve class E businesses?**

#### **M10. Active and sustainable travel**

The location of new development should continue to be considered against the adopted spatial strategy set out in the JLP and specifically policies SPT1, SPT2 and TTV1 and TTV2 [The new plan for South Hams, West Devon and... | The Plymouth Plan \(plymswdevonplan.co.uk\)](#). Government policy is increasingly supportive of locating development in the most sustainable and accessible settlements to facilitate modal shift to active travel ([Gear change: a bold vision for cycling and walking \(publishing.service.gov.uk\)](#) and bus service ([https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/980227/DfT-Bus-Back-Better-national-bus-strategy-for-England.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/980227/DfT-Bus-Back-Better-national-bus-strategy-for-England.pdf)). This strategy increases community resilience and nurtures our societal needs to collaborate, share and interact with other people. Switching to EV is not a substitute for sound placemaking based around the core principles of the adopted spatial strategy. As such, there are no new requirements introduced with regarding the location of new development.

Major development schemes will need to show how they are not only protecting existing walking and cycling infrastructure, but identify and deliver opportunities for additional links that contribute to the wider active travel network.

Active and sustainable travel requirements will be assessed against the adopted policies SPT10, SPT12.9, DEV15 and DEV29, as well as the associated sections of the SPD. Specific onsite benefits will continue to include incorporating safe and secure cycle storage.

**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.**

The Design and Access Statement (DAS) for majors will need to include an assessment of sustainable and active travel opportunities and constraints, and highlight clearly what benefits are being proposed as part of the development.

**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.**

We will signpost to [Local Cycling and Walking Infrastructure Plan](#) and the [Bus Service Improvement Plan](#).

What is required for relevant applications:

As part of the application	Cycle storage and charging points to be marked on site and floor plan
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What is required for residential developments over 50 dwellings:

As part of the application	Cycle storage and charging points to be marked on site and floor plan DAS to include an assessment of onsite car club and ebike hire potential and in Plymouth links with mobility hubs
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**Are there any other measure we should include to encourage more active travel?**

**Should we reference or signpost any other documents?**

**M I I. Reducing reliance on the private car**

Both the JLP and the National Planning Policy Framework (NPPF) say that in order to deliver sustainable development people need to have good access services and amenities within their local area. This means being able to meet their day to day without having to get into their car. The government in their plan for Decarbonising Transport ( [Decarbonising Transport – A Better, Greener Britain \(publishing.service.gov.uk\)](#) ) want walking, cycling or public transport to be the natural first choice for journeys.

We recognise this is particularly challenging in rural areas. We are aware of the Government’s rural mobility strategy ([Future of Transport: rural strategy – call for evidence - GOV.UK \(www.gov.uk\)](#) ) and will consider the outcomes to inform future policy. This will include considering how we can make use of innovative solutions to change behaviour and reduce reliance on the car.

**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.**

What is required for all relevant applications.

As part of the application	Demonstrate through Statement of Compliance
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**Should we resist development proposals that rely upon access solely by the private car?**

**Should thresholds be applied – for example bike storage/charging, footpath and cycle way connections, bus routes/funding bus services?**

**Are there any specific planning measures we could introduce to help reduce reliance on the car?**

**How should we deal with this issue in the rural areas?**

**Should we reference or signpost any other documents?**

**ADAPTATION – applicable to all development types**

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 within the JLP explicitly requires development to respond positively to the challenges of climate change, reducing carbon and creating communities that are more resilient. This sets the context for delivering high quality development. Adaptation measures can be overlooked. 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.

- Protecting our soil resource
- Protecting and enhancing tree cover
- Protecting and enhancing green spaces and greenfield sites
- Delivering sustainable drainage, surface water management and restricting urban creep
- Delivering biodiversity net gain and habitat improvements

**As part of the Statement of Compliance, applicants should identify how these adaptation requirements have been addressed. Any applications that do not adequately incorporate suitable adaptation measures should be refused.**

Further detail on each of these requirements is set out below:

**A1 - Protecting our soil resource.** Soils support biodiversity, sequester carbon and absorb water. The loss of soil cover to impermeable surfaces has numerous detrimental impacts.

All proposals should protect the soil resource and demonstrate measures to achieve this.

As part of the application	Demonstrate through Statement of Compliance
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**A2 - Protecting and enhancing tree cover.** Trees are crucial for helping to maintain our health and wellbeing; trees also support a huge amount of habitats and species and store carbon. Tree planting at a massive scale is a key component of the government plan to net zero.

All proposals should demonstrate how trees are protected and what new tree planting is proposed.

As part of the application	Demonstrate through Statement of Compliance
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**A3 - Protecting and enhancing green spaces and greenfield sites.** Green spaces and green fields sites have an intrinsic value and offer a wide range of existing multifunctional benefits. These

include as a soil resource, managing drainage and surface water, 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.

All proposals should demonstrate how the benefits and functions will be protected and enhanced.

As part of the application	Demonstrate through Statement of Compliance
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**A4 - Delivering sustainable drainage, surface water management and restricting urban creep.** 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.

Please note 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.

All proposals should demonstrate how these requirements will be achieved.

As part of the application	Demonstrate through Statement of Compliance
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**How rigorously should the Councils' enforce against non-porous hardstanding that do not have planning permission?**

**A5 - Delivering biodiversity net gain and habitat improvements.** Biodiversity and habitats are hugely significant to personal health and wellbeing, supporting ecosystems, carbon capture and storage, food production. The RSPB reports that the UK ranks in the bottom 12% of countries globally for biodiversity intactness, and have lost 60% of our habitats since 1970. The Joint Local Plan policy DEV26 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 is very important and increases the importance of this issue. New specific biodiversity net gain guidance, including habitat banking and costs will be produced and consulted on separately.

All proposals should demonstrate how appropriate levels of biodiversity net gain will be achieved.

As part of the application	Demonstrate through Statement of Compliance
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**Should we give increased emphasis to the inclusion of adaptation measures within development schemes?**

**Are there any additional adaptation issues that should be included?**

**Should we introduce a clearer framework for small-scale developments?**

**Do you know of any good examples of simple approaches to deliver biodiversity net gain in small development schemes?**

**Suggested new tool – Green Space Factor**

We are considering using a new tool that more effectively brings together all the adaptation issues and enables them to be considered holistically. The Green Space Factor tool could simplify the process for applicants and decision makers and increase the extent of adaptation measures secured through the development process. The Green Space Factor is a tool that measures the amount of green (and blue) space that is created within a development. A higher score is attributed to multi-functional green and blue surfaces that support biodiversity and habitat help to reduce the risk of overheating and effectively manage water run-off. For example a green roof, trees and permeable paving score higher than a sealed surface.

An example of how it works is set out below:

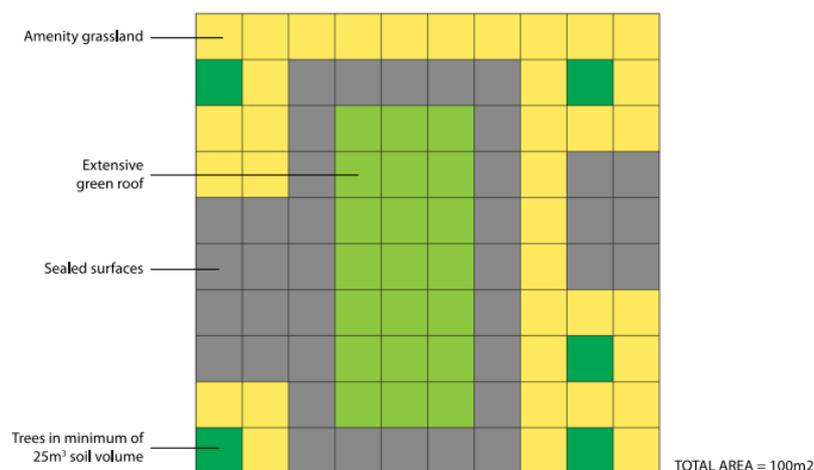
Step 1: Measure the development site and divide into 1m square blocks

Step 2: Assign a surface type to each block from a range of 20 or so types (eg. trees, green roof, planting, lawn, meadow, hedges, water features, permeable paving, sealed surface etc.)

Step 3: In a table combine the total areas for each surface type and apply the relevant score attributed to each surface

Step 4: Calculate the overall score by adding the area x the score for each surface (33.1) and divide this by the total surface area (100).

Surface	Total surface area	score	Overall Score
A (Green roof)	21	0.7	14.7
B (Sealed surface)	38	0	0
C (Lawn)	36	0.4	14.4
D (Standard trees)	5	0.8	4
	100		33.1



This is used extensively across London and further guidance available here [Urban Greening Factor \(UGF\) guidance | London City Hall](#). This provides clarification on how each surface type is defined and an excel spreadsheet is available to be completed by the applicant.

To use it effectively across our local planning authority areas we would want to develop the tool to ensure it is fit for purpose in our circumstances. The value of using the tool comes from attributing different threshold scores to different sites and different spatial locations. We would need to test the thresholds and ensure that they set to achieve the desired outcomes. In addition, we would need to identify suitable thresholds, by site typology, policy area, location within the settlement hierarchy, and development type. Before this tool can be introduced, further work is required to address all these issues.

We could also use it to recognise the inherent value and adaptation benefit of existing greenspace and greenfield sites and ensure that any development on green windfall sites provide much greater benefits than previously developed land and our existing housing allocations.

There are also opportunities for this Green Space Factor tool to integrate and complement the biodiversity net gain metric, especially for small sites.

If it is introduced it would apply to all development **proposals**. All schemes would have to achieve a score above a set threshold.

It would require applicants to submit:

- Schematic plan of site area, showing overall area of surface types
- Completed Green Space Factor calculator

**Do you think this is a good tool to achieve a wide range of adaptation measures? If not, what alternatives would work better?**

**Do you agree that factor scores should be adjusted according to the type and location of sites?**

**Do you have any views about what the thresholds should be?**

**Should we use this approach to ensure any green space or greenfield windfall development is required to deliver considerable adaptation benefits?**

**Do you think the Green Space Factor tool could be used effectively and simply to seek biodiversity net gain from small-scale development?**

**Do you agree that this tool needs a supporting document to define the different surface types and explain the different factor scores?**

### **Carbon offsetting**

There is already provision for offsetting within policy DEV32 that makes clear that this should be a last resort. There may be some exceptional circumstances when it may not be possible to meet all the mitigation and adaptation requirements of this Climate Emergency Planning Policy and Guidance. In these cases, with the agreement of the Local Planning Authorities', where it is demonstrably not possible to meet these requirements, a contribution to offset carbon emissions may be provided.

The Councils' will identify a list of suitable offsetting schemes that deliver carbon capture by 2030. All contributions will be secured through Section 106 agreements.

**Justification for any carbon offsetting should be included within the Statement of Compliance.**

What is required for all relevant applications:

As part of the application	Demonstrate through statement of compliance
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**Do you think we should provide for carbon offsetting in the event that measures cannot be delivered within the development scheme?**

**How do we quantify the carbon to offset for each measure?**

**What projects should be included?**

### Statement of Compliance

All applications are required to complete a Statement of Compliance. A draft is set out below.

This will demonstrate how you are meeting the mitigation and adaptation requirements and asks you to specify where this is included, ie what document or plan the evidence is contained in. If the requirement is not being met, you should set out the reasons for this.

Completion of the Statement of Compliance will be a validation requirement. This consultation is seeking views on this additional validation requirement and its inclusion in the validation checklist of all three Council's: Plymouth City, South Hams District and West Devon Borough.

Once this Climate Emergency Planning Policy and Guidance is adopted, the validation requirements and validation checklist will be updated.

<b>Climate Emergency Planning Policy Guidance – Statement of Compliance</b>			
<b>Requirement</b>	<b>Is the requirement being met (Y/N)?</b>	<b>If Yes, set out which document/plan the evidence is included in</b>	<b>If No, justify why the requirement is not being met.</b>
<b>Mitigation</b>			
M1 – Thermal efficiency			
M2 – Roof mounted solar pv panels			
M3 – Energy storage			
M4 – Heat pumps			
M5 – Passive solar gain & overheating			
M6 – Materials			
M7 – Principle of net gain			
M8 – Demolitions & replacement dwellings			
M9 – Electric vehicle charging points			

M10 – Active & sustainable travel			
M11 – Reducing reliance on the car			
Adaptation			
A1 – Soil resource			
A2 – Tree cover			
A3 – Green spaces			
A4 – Drainage			
A5 – Biodiversity net gain			
If the requirements above are not being met what offsetting is proposed and why?			

**Do you agree we should require a Statement of Compliance?**

**Should it include anything else?**

**Should it be included as part of the validation process and included within the Local Planning Authorities' validation checklist?**