

Moray Council Carbon Guidance for Planning Applications and S36 and S37 consents

Purpose

To support the development management process to determine planning applications against Policy 2 of National Planning Framework 4, which requires that *“development proposals will be sited and designed to minimise lifecycle greenhouse gas emissions as far as possible”* and *“development proposals will be sited and designed to adapt to current and future risks from climate change”*.

Threshold

This guidance will apply to:

- residential developments of 10 or more units
- commercial, industrial, retail, leisure, infrastructure developments where floor space is 1,000 square metres or more
- Energy related developments of 5MW or more (including battery storage, grid infrastructure and energy production).

Requirements

All planning applications within the stated threshold will be required to submit the following information. Submissions should address the questions raised within this guidance, as appropriate to the development:

- **Overview of development and key carbon and climate considerations**
 - Provide a brief overview of the development and the main considerations being given to whole life carbon reduction.
 - How does the development meet the needs of the current climate and future climate scenarios? How is the development designed with future climate risks in mind, or how may it be adapted to suit these changes in the future?
- **Whole life carbon assessment**
 - Which nationally recognised whole life carbon assessment method will be used (e.g. BS EN 15978, with additional guidance from RICS Professional Statement), and why was this method chosen?
 - Where will embodied carbon emissions occur within the proposed development, and how will these be measured and minimised? Provide breakdown of embodied carbon emissions by source and by each stage of the development's life cycle.
 - Where will operational carbon emissions occur within the proposed development, and how will these be measured and minimised through design? Provide a breakdown of operational carbon emissions by source and by development life cycle stage.
 - What does net zero emissions mean in the context of the proposed development and when will it be achieved? How will net zero emissions be achieved on this development, including specific low carbon measures or renewable energy systems that will be implemented?
 - If the proposed development does not achieve net zero emissions, provide an estimate of the annual tonnes of carbon emissions that will require offsetting to achieve net zero (refer to carbon sequestration statement section).

- **Carbon management and reporting plan**
 - How will carbon be managed and reported for the proposed development, including the process for verifying and validating reported carbon data?
 - Which nationally recognised reporting standard(s) will be adhered to for the proposed development's carbon reporting (e.g. PAS 2080:2023)? Explain why the chosen standard was selected and how it aligns with the goals and objectives of the proposed development.
 - Provide details on the frequency and format of ongoing carbon reporting by the developer to Moray Council.

- **Carbon sequestration statement**
 - What level of carbon is currently being sequestered on the site before the proposed development takes place?
 - What level of carbon will be sequestered on the site if the development proceeds as proposed, and what specific methods will be used to achieve this level of sequestration?
 - How will you monitor and manage carbon sequestration over time to ensure that the storage capacity of the site is maintained in the long term?
 - What potential risks or challenges are associated with achieving the proposed level of carbon sequestration, and how will these be addressed?
 - How will the sequestration of carbon be verified, and what measures will be implemented to ensure that verification is accurate and reliable?

- **Renewable energy and heat decarbonisation statement**
 - What renewable energy technologies and heat decarbonisation technologies are proposed to be included in the development?
 - What is the proposed capacity of the renewable energy systems and heat decarbonisation technologies?
 - What is the expected energy output of the proposed renewable energy systems?
 - How will the proposed renewable energy systems and heat decarbonisation technologies be integrated into the development, and what impact will this have on the design and layout of the development?
 - Will the proposed renewable energy systems be connected to the national grid? Has a grid connection been agreed with the relevant network operator?
 - What consideration has been given to the potential for community ownership or other wider involvement in the renewable energy systems or a heat network?
 - Justify why proposed renewable energy and heat decarbonisation systems are the most appropriate for this development.

- **Barriers to net zero statement (this will be used to inform strategic planning and development)**
 - What are the main challenges that you foresee in achieving net zero on the proposed development?
 - Are there any technical limitations or technological barriers that could prevent the development from achieving net zero? If so, what are they and how can they be addressed?
 - Are there any financial barriers to achieving net zero on the development? If so, what are they and how can they be addressed?
 - Is there a lack of expertise or skills available in implementing low carbon measures or renewable energy systems? If so, what are they and how can they be addressed?

- Are there any legal or regulatory barriers that could prevent the development from achieving net zero? If so, what are they and how can they be addressed?
- Are there any stakeholders or groups who may have concerns or objections to the implementation of low carbon measures or renewable energy systems as part of the proposed development? If so, who are they and what plans are in place to engage with and address these concerns?

Additional information

A pre-application advice service is available for developers to seek guidance on how best to incorporate the requirements of Policy 2 into their proposals before submitting a planning application.

http://www.moray.gov.uk/moray_standard/page_41669.html

Feedback and support will be provided to developers during the planning process to help them understand any potential issues or challenges related to achieving the requirements of Policy 2, and work collaboratively with them to find solutions and overcome barriers.

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