
GJS Plot C (137226/FO/2023) and Plot D (137227/FO/2023) - NZG Note

From Britton, Ed [REDACTED]

Date Mon 09/06/2025 13:29

To Lucy Harrison [REDACTED]

Cc Poole, Rachel J [REDACTED]

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Hi Lucy,

For completeness, the Applicant has reviewed Places for Everyone policies JP-S2 and JP-S3, and the recently published Net Zero Design Planning Guidance.

Within this context, the professional team has provided the overview note below that addresses key considerations and identifies where these have been addressed in the submitted application.

Please let me know if you have any queries.

Kind regards,

Ed

1. Fabric efficiency requirement
 - The ESS includes representative SAP calculations that demonstrate the CS3 space heating demand performs significantly better than the PFE targets
 - Please refer to Chapter 9 in the ESS (v1.2, issued May 2024)
2. Energy Use Intensity (EUI)
 - Both regulated and unregulated energy emissions have been included as part of the assessment of operational energy emissions in the climate change chapter (for both domestic and non-domestic typologies).
 - At the time of writing, no Carbon Offset fund has been set up by the LPA and would therefore not be possible to consider it as an allowable solution.
3. PV Footprint Area
 - There are feasibility constraints due to the form of the buildings and limited footprint / roof area.
 - Instead, the scheme proposes air source heat pumps, which is a highly efficient renewable heating technology.
 - Please refer to Chapter 6 in the ESS (v1.2, issued May 2024)
4. No fossil fuels and low carbon heat
 - The scheme benefits from a 'full electric' energy strategy.
 - No fossil fuels are proposed for use in operation by the scheme.
 - The specification of air source heat pumps, which is a highly efficient renewable heating technology, will generate carbon emissions reductions of 74% when assessed against Part L

(2021) of Building Regulations.

- Please refer to Chapter 5 in the ESS (v1.2, issued May 2024)

5. Building Reg Part O met without active cooling

- The scheme does not employ active cooling to mitigate overheating
 - Part O compliance has been demonstrated by the submitted AVO report, prepared by FutureServe.

6. Embodied Carbon

- The latest guidance states that upfront and life cycle embodied carbon modelling is expected.
 - Embodied carbon calculations were completed to inform the Environmental Statement Climate Change ES Chapter

7. Offsetting Contribution

- Both regulated and unregulated energy use for residential areas were considered in the Environmental Statement Climate Change Chapter, prepared by WSP.
- The price of carbon and mechanism for offsetting is not yet established.
 - The PfE guidance currently states- *'options for offsetting are currently under development and are to be adopted by each LPA'*

Ed Britton

Pronouns: he / him / his

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