



Getting to Net Zero
(formerly Carbon Offset)
Supplementary Planning Document
Consultation Report

October 2022

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1. Introduction

- 1.1. In June 2022, the London Legacy Development Corporation (the Legacy Corporation) conducted a review of the Carbon Offset Supplementary Planning Document (SPD), adopted in August 2016. The revised SPD was renamed to Getting to Net Zero SPD to better reflect the overall approach within which carbon offsetting sits. The revised SPD focuses on the need to achieve the Local Plan policy requirement of net zero carbon development including the payment of a carbon offsetting sum once all other measures to achieve carbon reduction onsite have been included.
- 1.2. The statutory public consultation on the draft revised SPD was carried out for seven weeks, between 6 June and 25 July 2022. The purpose of the consultation was to engage those who live, work and have an interest within the Legacy Corporation area and to encourage them to review and comment on the proposed changes. The consultation responses received during the consultation period have informed the final version of the document.
- 1.3. A variety of methods were used to engage with the local community and other stakeholders, including information on a specific webpage for the SPD; emails to a contact database of local residents, statutory and technical consultees, businesses and residents groups. The public consultation engagement included two online workshops, two community meetings, and be-spoke engagement with the key stakeholders such as the four boroughs (London boroughs of Newham, Hackney, Tower Hamlets, and Waltham Forest) and TfL. As a result, a total of 12 representations to the draft revised SPD were received. A full summary of the consultation responses is set out in Appendix 1.
- 1.4. The purpose of this consultation report is to demonstrate the consultation undertaken in reviewing the SPD in accordance with Regulation 17 of the Town and Country (Local Development) (England) Regulations (as amended) and the Legacy Corporation's adopted Statement of Community Involvement (2017). The consultation report shows how and who has been consulted in the preparation of the SPD and provides a summary of the main issues raised with the consultation responses, and how those issues have been addressed. All consultation comments are set out in Appendix 1 of this document.

2. Consultation process/communication and promotion

2.1. The Legacy Corporation ensured a variety of methods were used to facilitate effective engagement throughout the consultation process. This section sets out the process, communication, and promotion of the public consultation.

2.2. The consultation methods used to promote engagement during consultation process were selected in accordance with statutory requirements, the Legacy Corporation SCI (2017) and other good practices. The methods used were varied and selected to facilitate effective and proportionate engagement.

2.3. Table 1 provides a summary of consultation methods; these are compared against the requirements set within the Town and Country Planning Local Planning (England) Regulations and the SCI showing how the Legacy Corporation met these requirements.

Table 1: Summary of engagement and communication methods

Statutory requirement - Town and Country Planning Local Planning (England) Regulations 2012	Methods of engagement identified in the Legacy Corporation SCI 2017	Methods used
Notify the bodies of subject of the local plan: <ul style="list-style-type: none"> • Specific consultation bodies (statutory consultees) • General Consultation bodies (bodies representing different groups within the area's community) • Residents and other key persons considered appropriate (i.e. those on the consultation database). 	<ul style="list-style-type: none"> • Emails and letters to individuals on the consultation database (including specific and general consultation bodies) • Updated Website Section signposting to consultation platform • Dedicated email address • Web-based consultation platform • Use of social media • Attending meetings of community groups and organisations • Workshops, drop-in sessions, exhibitions, focus groups 	<ul style="list-style-type: none"> • Emails and letters at all key stages in the review process to the consultation database including statutory consultees • Dedicated email address and telephone number • On-line consultation platform • Use of social media and event promotion platform • Attendance to community group meetings and organisations • Two online public consultation workshops

- 2.4. The Legacy Corporation's planning policy team maintains an extensive consultation database that includes all members of a general body and statutory consultees, local residents and businesses, as well as those who have presented an interest in the area and wish to be kept informed through registration on the consultation database. The database contains more than 400 contacts, 70 per cent of which consists of residents' groups, community groups and community organisation. At the start of the consultation period, all consultees on the database were informed of the consultation and the methods by which they could partake. Consultees were informed by email or post as per preferences stated.
- 2.5. The Legacy Corporation social media feeds were also used to publicise the launch of the consultation period and advertise each consultation workshop; inviting people to join the consultation events, or alternatively, for those who were not able to attend the events, a direct link to the online consultation platform where all relevant information and documents could be found, and comments submitted, was provided. Use of social media gave an opportunity for the information about the consultation to be shared more easily and thereby potentially reach out to typically hard to reach groups.
- 2.6. Online consultation platform, Commonplace, was used as the main way of promoting, collecting and collating consultation comments. Commonplace is a user-friendly online platform allowing consultees to read about the project, know the timeline for the project, view the consultation documents and provide comments alongside viewing comments left by others. The use of Commonplace also facilitated the process to be conducted online, to reflect the shift to online consultations brought about by Covid-19.
- 2.7. The Legacy Corporation's SPD webpage was updated informing and signposting consultees to the consultation platform and relevant documents, providing detailed information about the purpose of the consultation, the consultation period, and how to make a representation. All consultation documents were made available for reading and/or download in an easily accessible format.
- 2.8. It is noted that the Covid-19 pandemic had changed ways of working and connecting with communities, including conducting consultations. Whilst previously digital engagement supplemented face-to-face methods of consultation, as we emerge from the pandemic, digital engagement in its enhanced role remains as a popular and accessible method of engagement. There is evidence that suggests higher participation via digitally led engagement from a broader range of individuals than was previously achieved through more traditional methods of communication. As a result, online methods of consulting were prioritised in order to be more accessible to a wider range of audiences, particularly as hybrid methods of working have taken hold. To respond to this change, two online workshops were organised, providing a daytime and evening slot to invite stakeholders to provide their views on the draft revised SPD. These were conducted via MS Teams, where attendees received a brief presentation outlining key changes proposed and an opportunity to ask the Legacy Corporation's planning policy officers questions.

- 2.9. Planning policy officers attended two community meetings, the Park Panel and Cultural Interest Group, to inform them of the review of the SPD and engage them in the process. A briefing including a presentation and the opportunity to ask questions was provided for Park Panel, which comprises 15 representatives from local community groups and local businesses within the Legacy Corporation area and meets regularly throughout the year. This meeting was held in person in order to maintain rapport and provide the opportunity to answer any questions. A briefing including a presentation and the opportunity to ask questions was also provided for a local Cultural Interest Group serving Hackney Wick and Fish Island. This was held online to inform local residents and stakeholders of the consultation.
- 2.10. In accordance with the Duty to Cooperate, London Boroughs of Hackney, Newham, Tower Hamlets and Waltham Forest, TfL and Lee Valley Regional Park Authority were informed of the consultation and given the opportunity to engage at the regular monthly Planning Policy Forum meetings.
- 2.11. An email address was provided for all correspondence relating to the consultation and was shared online and at each consultation event, people were actively encouraged to contact the Legacy Corporation using these details should they wished to raise any questions or provide comments with regards to the consultation, SPD document or for any further information. Emails were regularly checked throughout the consultation period; all correspondence was acknowledged, and queries have been answered in a timely fashion.

3. Consultation Responses

3.1. A total of 12 representations to the draft revised Getting to Net Zero SPD. All representations received were taken into consideration and acknowledgment emails were sent to all those who have submitted a formal representation. The full consultation table with responses is provided in Appendix 1 which provides a summary of representations received during the consultation period. A response to each representation is also set out here and includes, where relevant, any changes that have been made to the SPD as a result.

Appendix 1- Consultation Responses

Getting to Net Zero SPD Consultation Responses Table

Ref no.	Consultee and Organisation	SPD Section	Comment Summarised	Response to comment	Changes proposed to SPD
GNZ01	Natural England	All	Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.	Comment noted	No change proposed
GNZ02	Coal Authority	All	London and it's Boroughs lie outside the defined coalfield and therefore the Coal Authority has no specific comments to make on your Local Plans / SPDs etc.	Comment noted	No change proposed
GNZ03	National Highways Limited	All	National Highways have undertaken a review of the draft Getting to Net-Zero and Planning Obligations Supplementary Planning Documents and raise no objections.	Comment noted	No change proposed
GNZ04	Port of London Authority	Annex 1	The PLA support the reference to the requirement for information to be provided on navigation or conservancy impacts where relevant along with evidence of landowner consent for proposals including this type of technology.	Comment noted	No change proposed
GNZ05	Thames Water	General	Most of the renewable electricity Thames Water self-generate comes from the treatment of sewage sludge via anaerobic digestion, but to help meet the carbon zero target the use of more solar power is proposed on Thames Water's operational sites and this should be supported in the SPD.	The SPD primarily provides guidance on how to achieve net zero carbon targets in major new development. However, the LLDC recognises the contribution that retrofitting existing buildings can have in reducing emissions. The London Plan and the LLDC's Local Plan provide a supportive context for retrofit measures such as the installation of Solar PV.	No change proposed

GNZ06	TFL	General	TfL have no comments.	Comment noted	No change proposed
GNZ07	Sport England	General	Sport England have no comments	Comment noted	No change proposed
GNZ08	Canal and River Trust	Relevant sections including the following: Annexe 1:	C&RT welcome the reference to the Trust under Appendix 1	The SPD has been drafted to reflect the Energy Hierarchy, and the use of waterways for heating and cooling (e.g. through Water Source Heat Pumps) would be supported, where appropriate, under the third tier of this hierarchy ('be green'). The LLDC also recognises the opportunities that waterways present for improved drainage, as outlined in Policy BN.2 of the Local Plan. However, the focus of the SPD is climate change mitigation through emissions reductions, rather than climate change adaptation, as achieved through flood resilience measures for example.	No change proposed
GNZ08	Canal and River Trust	Energy Sources	The use of the Electricity Displacement Method of carbon intensity calculations, should not be used, but a direct method of calculating carbon	As outlined in Policy SI 2 of the London Plan, the GLA 'will continue to regularly update the guidance on preparing energy strategies for major development.' Consequently, it is expected that energy assessments are undertaken in accordance with the GLA's most recent guidance, which presently takes the form of <i>Energy Assessment Guidance: Greater London Authority guidance on preparing energy assessments as part of planning applications (June 2022)</i> .	No change proposed

GNZ08	Canal and River Trust	Sustainable Travel	SPD could consider design that encourages sustainable travel.	It is considered that the LLDC's Local Plan policies, namely Section 7 of the Local Plan, sufficiently address sustainable travel. Policy T.4 is particularly relevant in this regard, requiring street networks that prioritise pedestrians and cyclists as the most important travel modes, followed by public transport and then the private car.	No change proposed
GNZ08	Canal and River Trust	Carbon offsetting through the LLDC Carbon Offset Fund	<p>The SPD should also include options to fund projects supporting active travel e.g Towpath improvements, improved wayfinding signage.</p> <p>The Trust also supports the provision of electric eco-moorings to encourage boats to use electricity over coal and wood burning.</p>	One of the categories of project that can be funded through the Carbon Offset Fund is 'behavioural change'. Behavioural change projects could encompass projects that would encourage modal shift to more sustainable forms of transport. Additionally, it is noted the Canal and River Trust have engaged constructively with the LLDC during the review of the Infrastructure Delivery Plan Project List in May 2022; consequently, a number of towpath improvements and the provision of eco-moorings are included as items on the updated list (namely, Items 16, 38, 39, 46 and 63)	No change proposed
GNZ08	Canal and River Trust	Carbon Offset Bidding	The Trust would be interested in updates on the Carbon Offset bidding rounds and would welcome being added to this consultation list.	Comment noted.	No change proposed

GNZ09	Deloitte on behalf of UCL	All	<p>UCL is supportive of the principles and ambitions as set out in the draft Getting to Net Zero SPD, but see the need for additional clarity where these are constrained by the current situation associated with the DHN. As such, UCL would be grateful for the opportunity to work and discuss further with LLDC the draft SPD and its related targets and aspirations. We therefore request to be kept informed of further preparation and development of the SPD document.</p>	<p>It is noted that the Greater London Authority has recently published a guidance note entitled <i>Energy Assessment Guidance updates - Part L 2021 of building regulations</i>, which includes the following provision: 'Developments connecting to gas-based district heat networks (DHNs) may also find it more challenging to achieve significant on-site carbon reductions beyond Part L 2021 until the decarbonisation strategies for these networks begin to take effect. Developments in Heat Network Priority Areas (HNPA)s are expected to connect to a network where possible to support London's decarbonisation provided the network has a decarbonisation strategy, that it does not exceed the CO2 emission and primary energy factors set out in Part L 2021, and that any expansion in the capacity of the network to serve a new development is from a low carbon heat source.' In accordance with this guidance note, as well as policies SI 3 of the London Plan and S.3 of the Local Plan, the LLDC would still expect development to connect to the QEOP DHN, provided that the aforementioned conditions are met.</p>	<p>Add new text section to the SPD that clarifies how the latest GLA guidance will be used in respect of development proposals and connection to the DHN:</p> <p><u>"District Energy networks and GLA guidance</u> <u>A significant part of the LLDC area is served by a District Heating Network, served by two energy centres, at Kings Yard in Hackney Wick and adjacent to Westfield Stratford City. In order to meet planning and other climate change related policy targets, heat networks will need to decarbonise their energy inputs. This is supported by the London Plan and Local Plan net zero carbon targets referred to in this SPD. London Plan Policy SI 3, Energy Infrastructure, is clear that where a district heat or energy network is available to connect to, that this should be the first choice in the hierarchy of option. Where a heat network is planned but not yet delivered it requires that the development is designed to "allow for the cost-effective connection at a later date".</u> <u>The GLA guidance on Energy Assessments (June 2022), as it applies to locations served by a District Heat Network (DHN) is, as a result, particularly relevant. The guidance requires that:</u> <u>"Where a heat network exists in the vicinity of the proposed development the applicant must prioritise connection to that network</u></p>
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					<p><u>provided that:</u></p> <ul style="list-style-type: none"> • <u>The network does not exceed the CO2 emission and primary energy factor limits set out in [Building Regulations] Part L 2021</u> • <u>The network operator has agreed a decarbonisation strategy with the GLA and the relevant borough or is in the process of doing so."</u> <p><u>It may be that a DHN operator will need to introduce decarbonisation measures in phases over time to achieve decarbonisation of its network and this will need to be addressed by the decarbonisation strategy.</u></p> <p><u>Where an agreed decarbonisation plan is in place, relevant development schemes will continue to be required to show that they can achieve a carbon reduction of at least 35% above Building Regulations Part L before making any carbon offset payment. However, the point at which a carbon offset payment is calculated and becomes payable will take account of any phased decarbonisation measures by allowing this to be calculated and paid prior to first occupation of the development, or where the scheme is phased, calculation and payment of the carbon offset payment for each phase prior to the first occupation of that phase."</u></p>
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GNZ10	Private Individual	Introduction	Ensure carbon offset payments are only utilised as a last resort, more can be done within this SPD	Comment noted, however it is recognised that the SPD is an ambitious document; in particular, it directs potential applicants to the <i>Preparing For a 1.5 Degree C Future</i> document which provides clear guidance on how net zero carbon targets can be achieved on-site, while remaining within the boundaries of existing adopted planning policy.	No change proposed
GNZ10	Private Individual	Policy Background Paragraph 2.1	The need or airsource heat pumps as well as the current dependency on the district heat network (in line with various policies) are not mentioned in this consultation document.	<p>It is acknowledged that the in paragraph 9.3.3 of Policy SI 3 of the London Plan, a requirement for existing DHNs 'to establish decarbonisation plans' is identified. The GLA Energy Assessment Guidance, as updated in June 2022 sets out the expectation that for existing DHN, operators are expected to put an agreed decarbonisation plan in place to provide certainty that new development connecting to that network will be able to meet Part L of the Building Regulations and over time achieve full decarbonisation. This expectation applies to the QEOP/Stratford City heat network. A new section of text is proposed to be added as set out alongside the response to Comment GNZ09 above setting this out in detail.</p> <p>It is also noted that paragraph 9.3.8 of Policy SI 3 of the London Plan supports increasing the amount of renewable and secondary energy generation, including through the</p>	See proposed additional text set out alongside the response to representation GNZ09.

				use of heat pumps. These fall within the third tier of the energy hierarchy: 'Be green: use renewable energy'. Although air source or other heat pumps may have a significant role in achieving net zero targets for new development and potentially as part of decarbonisation strategies for heat networks, it is beyond the scope of the SPD to promote or prescribe the specific technologies which must be used to reach this net zero target.	
GNZ10	Private Individual	Paragraph 3.5	Unable to find 1.5C document online, SPD is not robust	Comment noted	Add hyperlink to the <i>Preparing for a 1.5 Degree C Future</i> at paragraph 3.5 of the SPD.
GNZ10	Private Individual	Approach to reducing carbon from development and reaching net zero Paragraph 3.6	The SPD does not address two mandatory details, the need to decarbonise the current Olympic district heat network and the need for airsource heat pumps.	See response to comment GNZ10 (Policy Background, Paragraph 2.1) above.	See proposed additional text set out alongside the response to representation GNZ09.

GNZ11	Private Individual	Approach to reducing carbon from development and reaching net zero	<p>Suggestions for the inclusion of the following to the SPD:</p> <ul style="list-style-type: none"> - following guidance set out in "Preparing for a 1.5 C future: Framework and guidance for new buildings: February 2021 LLDC" - Noting new builds should not connect to the Olympic Park district heat network - Mandating heat pumps as the primary source of heat for new builds - Prioritising solar PV installation for all new builds. - LLDC should set out how it plans to decarbonise the Olympic Park Heat Network. 	The purpose of this SPD is to provide guidance on how development proposals can address the London Plan and Local Plan policies that require development to meet the specified net zero target and is not intended to be specific about the solutions that are employed to meet the target. The response set out to representations above and the proposed new text in respect of decarbonisation of existing heat networks set out alongside representation GNZ09 reflects the current CLA guidance for this.	See proposed additional text set out alongside the response to representation GNZ09.
GNZ12	Get Living	Paragraph 1.4	Supportive of using COF as last resort	Commented noted	No change proposed
GNZ12	Get Living	Policy Background Paragraph 2.5	Supportive of "highlight the importance of other cost-effective mitigation measures"	Commented noted	No change proposed
GNZ12	Get Living	Policy Background, Table 1	Get Living would welcome ambitious reductions, beyond 35%.	The LLDC recognises that achieving net zero carbon on-site will require emissions reductions in excess of 35% above Building Regulations. However, as set out in the London Plan and Local Plan policy summarised in Table 1 of the SPD, 35% is the minimum reduction required by policy. Specifying a higher minimum reduction would go	No change proposed

				beyond the scope of the SPD. Nevertheless, the SPD provides a supportive context for development that is able to exceed this target.	
GNZ12	Get Living	Approach to reducing carbon from development and reaching net zero Paragraph 3.3	Supportive of approach	Comment noted	No change proposed

GNZ12	Get Living	Approach to reducing carbon from development and reaching net zero Paragraph 3.4	Noted contradiction within GLA document	Although unregulated emissions would not be captured by Energy Strategies, they would be by Whole Life Cycle-Carbon Assessments. London Plan Policy SI 2 requires that: 'Development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a national recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions'. This requirement is reflected in Table 1 of the SPD.	Add additional paragraph to Section 3 of the SPD : <u>'London Plan Policy SI 2 also requires development proposals that are referable to the Mayor to calculate whole life-cycle carbon emissions, and to demonstrate how these will be reduced. Whole Life-Cycle Carbon Assessments (WLCA) should be undertaken in accordance with the GLA's London Plan Guidance: Whole Life-Cycle Carbon Assessments or any successor guidance document. One of the important functions of the WLCA is to calculate a development's unregulated operational emissions. It is also noted that, as per London Plan Policy SI 2, 'major non-referable development should calculate unregulated emissions and are encouraged to undertake whole-life cycle carbon assessments;' the LLDC will therefore encourage all major developments to submit WLCAs.'</u>
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GNZ12	Get Living	Approach to reducing carbon from development and reaching net zero Paragraph 3.5	Get Living applaud LLDC's candour in acknowledging these issues and echo the need for ambitious and effective targets.	Commented noted	No change proposed
GNZ12	Get Living	Approach to reducing carbon from development and reaching net zero Paragraph 3.6	<p>Get Living note concerns that the aim "to generate 100% of the energy consumption on-site" is arbitrary and may be technically unfeasible.</p> <ul style="list-style-type: none"> - We also have concerns that using town planning powers to "Measure and verify performance" in operation may duplicate emerging taxation policy, while reference to "CIBSE TM59 or TM52" may duplicate emerging Building Regulations Approved Document Part O. - Get Living question whether town planning measures are the most effective mechanisms to address disclosure of operational emissions and designing to avoid overheating. 	<p>Paragraphs 3.5 and 3.6 of the SPD set out the background and principles within the LLDC document 'Preparing for 1.5°C future – Framework and guidance for new Buildings' which is intended to address the approach that could be taken for its own development in increasing its contribution to meeting its net zero carbon targets. This section is included to provide helpful in principle direction and guidance for development proposals being brought forward by others rather than being planning policy in itself. An amendment to the text is proposed in order to make this clear.</p> <p>The aim expressed here. to generate 100% of energy consumption on-site through renewables is in accordance with London Plan and Local Plan policy. At each stage of the Energy Hierarchy (including 'be green: use renewable energy'), carbon emission reductions should be maximised. Maximising these reductions effectively entails seeking to generate 100% of the energy consumption on-site through renewables, while recognising that this may not be possible in all cases. Likewise, the requirement to</p>	<p>Amend paragraphs 3.5 and 3.6 as follows:</p> <p>"In a response to the climate emergency, LLDC has prepared a guidance document Preparing for 1.5°C future to set out LLDC's vision and aspirations for the built environment. <u>The document provides pragmatic guidance on the delivery of exemplar developments when preparing for a net zero carbon and 1.5oC Paris Agreement proof future. It is intended to address the LLDC's own development delivery and is referred to here as setting out helpful principles and guidance for other development schemes rather than as a 'planning requirement'.</u> Other guidance in this SPD is more directly related to meeting planning policy requirements in the London Plan and Local Plan.</p> <p><u>In this context</u> the document shows that LLDC are currently on a trajectory to miss 2030 zero carbon target. It is therefore <u>seen as important</u> necessary that <u>these</u> developments strive to achieve more ambitions and effective targets. <u>This best practice guidance</u></p>

				<p>'measure and verify [energy] performance' is a clear policy requirement for major development, as per the 'Be Seen' provision of London Plan Policy SI 2. It is also considered that addressing overheating through town planning measures is appropriate. Policy SI 4 of the London Plan requires that 'major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems'. Paragraph 9.4.5 of this policy subsequently clarifies that '[CIBSE] TM 59 should be used for domestic developments and TM 52 should be used for non-domestic developments.'</p>	<p>is also likely to be helpful for non <u>LLDC developments schemes as they seek to demonstrate compliance with planning policy requirements to meet net zero targets.</u> should take account of the best practice guidance set out in this document and demonstrate how key actions to meet net zero carbon would be achieved. Detailed guidance to the practical approach for each of the key actions is set out in the LLDC Preparing for 1.5°C future – Framework and guidance for new buildings."</p>
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GNZ12	Get Living	Carbon Offsetting through the LLDC Carbon Offset Fund Paragraph 4.2 and 4.9	Get Living suggest early payment would increase costs of development finance, which might be avoided by requiring payment in arrears.	The GLA's document <i>Carbon Offset Funds: Greater London Authority guidance for London's Local Planning Authorities on establishing carbon offset funds</i> states that 'taking payment later than commencement of works can mean a high degree of uncertainty as to when funding will be received and is unlikely to enable carbon savings from the offset fund to be delivered before the development is occupied, creating a delay in offsetting a development's carbon impact.' Therefore, to avoid substantial periods during which a development's carbon impact is unmitigated, wording has been included in the SPD to the effect that 'payment of carbon offset contributions will typically be due on commencement of development, unless it is phased.' Nonetheless, the wording permits exceptions, including where such a trigger point would render a development unviable.	No change proposed
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GNZ12	Get Living	Applying Carbon Offset Monies Paragraph 5.3	Get Living suggest aligning with the Oxford Principles,	<p>The LLDC does not have sufficient evidence of the local availability of carbon removal measures, as opposed to emission reduction measures. As the consultee notes, it would be unlikely that such measures could be identified within the London Boroughs of Hackney, Newham, Tower Hamlets and Waltham Forest. Given that the LLDC also considers and assesses the co-benefits that carbon offsetting projects can deliver for local communities, relying on more geographically dispersed carbon removal measures (e.g. reforestation) would constrain the fund's capacity to achieve its aims. The Oxford Principles note that emissions reductions measure remain necessary to maintain long-term net zero carbon emissions. Allocating carbon offset funds exclusively to emissions reductions therefore considered to remain a legitimate approach.</p>	No change proposed
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