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USING LOCAL POWERS TO MAXIMISE ENERGY EFFICIENCY RETROFIT

‘HOW TO’ MATERIALS FOR LONDON BOROUGHs

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MAYOR OF LONDON

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FOREWORD

With London's population set to increase by one million in the decade between 2011 and 2021, housing becomes less like a commodity and more like a key infrastructure asset, essential to the city's vitality. The Mayor of London, London boroughs and housing providers are building new homes to ensure that there is a sufficient, high quality supply of homes to meet London's growing demand. Just like our historic transport system and water mains, we must bring the same fervour to maintaining and improving the condition of our existing homes: increasing their efficiency and the standard of living that they provide. Driving forward energy efficiency retrofit on a far greater scale than previously will be critical to support London's growth.

The opportunity for energy retrofitting in London's housing is immense: more than one in five of the U.K.'s solid walled homes are in the capital, as well as 14 per cent of England's fuel poor homes. And the benefits of attracting funding for retrofit are even greater: reducing our demand for energy resources and helping London's most vulnerable households out of fuel poverty.

Thirty-two per cent of London's greenhouse gas emissions are generated from homes and 80 per cent of London's buildings will still be in use by 2050. Wide-scale energy efficiency retrofit is therefore crucial to meeting both the Government's target to reduce greenhouse gas emissions by 50 per cent on 1990 levels by 2020 as well as the Mayor of London's target to reduce London's carbon emissions by 60 per cent on 1990 levels by 2025.

Retrofit also offers wider benefits to the day-to-day lives of Londoners. Making homes cheaper to keep warm reduces fuel poverty and its health impacts. Insulating homes brings them to a higher standard and can overcome chronic issues of poor ventilation and damp. Energy efficiency projects can regenerate entire communities, drive up housing values and engage residents in wider issues of sustainability. Retrofitting also provides an opportunity for pioneering local authorities to get an edge in the growing energy efficiency market and generate local jobs.


Despite these significant benefits, London has historically struggled to attract retrofit funding. Just 5 per cent of all measures installed under previous funding schemes CERT and CESP were installed in the capital – a loss of over £480 million when compared to the potential proportion of measures. Some of London's retrofit challenges are inescapable: a significant number of flats and hard to treat homes, higher labour costs and the highest proportion of both privately rented homes and conservation areas in all of England.

The Mayor has worked with London boroughs and the energy efficiency supply chain to identify the top three local powers that can be wielded to overcome these challenges: planning, use of borough-held data and logistical support. This toolkit provides guidance and examples of how local authorities can, and indeed have, maximised these powers to attract energy efficiency funding, deliver retrofit projects and realise the benefits this brings to their residents.

The Green Deal and Energy Company Obligations (ECO) are an excellent opportunity to fund retrofit works in London's housing. Funding is available for solid wall insulation and hard to treat cavities. Green Deal loans are repaid by the bill-payer, reducing landlords' costs. Based on London's share of ECO-qualifying homes, the equivalent proportion of forecast ECO funding is £261 million per annum until March 2015.

The Green Deal and, we expect, ECO are both long-term schemes. London cannot afford let these opportunities go by. All levels of government have a role to play in ensuring that energy retrofit is delivered thoroughly and efficiently.

We highly commend the boroughs that have already invested in making their local powers work for them to drive investment in their critical housing infrastructure. We call on all London boroughs to look at how the best practice identified here could be implemented in their local authority. We look forward to the wider use of local powers to unlock the massive benefits that energy efficiency retrofit can provide to our capital city, for a sustainable, more prosperous future.



Richard Blakeway

Deputy Mayor for Housing, Land and Property
Greater London Authority



Niall Bolger

Chief Executive, London Borough of Sutton
Chair of RE:NEW Sponsors Board

1. INTRODUCTION

This toolkit has been developed to help London's councils identify and implement solutions to help attract investment and delivery for energy efficiency measures. It focuses on three commonly cited challenges: planning, data and logistics.

The toolkit has been produced as the result of the Mayor of London's project to work with boroughs to identify how local powers can be best used to maximise energy efficiency retrofit in London. It was produced by CAG Consultants (www.cagconsultants.co.uk) on behalf of the Greater London Authority (GLA).

About this toolkit

- Section 2 of the toolkit outlines the **business case for action**. It outlines the significant opportunities there are for councils who take steps to help attract delivery agents to undertake energy efficiency projects in their borough. The evidence in this section is intended to be used by council officers and Members to help make the case for action;
- Sections 3, 4 and 5 set out steps that councils can take to help ensure that their approaches to key issues support and promote energy efficiency retrofit works. All three sections include case studies on the approaches that some council are already taking.
- Section 3 focuses on **planning**, particularly in relation to external wall insulation and conservation areas.
- Section 4 examines **data**, particularly in relation to data on housing stock and benefits claimants; and
- Section 5 looks at **logistics**, particularly in relation to parking and storage. It includes case studies on the approaches that some London boroughs are already taking;
- Appendix A is a **briefing template** that councils can adapt and use to create internal briefing papers on the issues above; and
- Appendix B sets out a **data-sharing agreement** provided by the London Borough of Southwark that other councils can adapt and use to help facilitate the sharing of data with third parties.

Background

The UK has a target to cut carbon emissions by 80 per cent by 2050, while the Mayor's Climate Change Mitigation and Energy Strategy, published in 2011, sets out a target to reduce London's carbon dioxide (CO₂) emissions by 60 per cent by 2025 (from 1990 levels). Emissions from buildings account for 78 per cent of London's emissions (with homes accounting for 36 per cent). Given that around 80 per cent of London's buildings will still be standing in 2050, energy efficiency retrofit is essential to meeting the Mayor's targets.

Additionally, under the Home Energy Conservation Act, local authorities are required to report on the energy conservation measures that the authority considers practicable, cost-effective and likely to result in significant improvement in the energy efficiency of residential accommodation in its area.

Domestic energy efficiency retrofit in London is challenging. London received 5 per cent of measures delivered under CERT and CESP¹, compared to a 12 per cent share of population and a 14 per cent share of fuel poor households. The region's challenges include higher costs associated with installing measures; a high number of properties in conservation areas and listed buildings; a high proportion of private rented properties; and a high proportion of hard to treat properties (including flats and those with solid walls).

However, the potential and need for domestic energy efficiency retrofit in London is high. Based on a survey of London's social housing providers alone, energy efficiency retrofit projects were identified worth a total value of over £950m and covering over 100,000 homes. Local authorities have a significant role to play in not only retrofitting their managed housing stock, but enabling private and social landlords as well as owner-occupiers to access available retrofit funding and deliver energy efficiency works to their homes.

¹ CERT (the Carbon Emissions Reduction Target) and CESP (the Community Energy Saving Programme) were the Government's key energy efficiency programmes prior to the introduction in 2013 of the Green Deal and the Energy Companies Obligation (ECO).

2. THE BUSINESS CASE

There are several reasons why boroughs should use their local powers to encourage energy efficiency investment to improve the energy efficiency of London's housing stock. This will:

- Help to **minimise fuel bills** – particularly important at a time when welfare benefits are being reduced. Energy bills have increased by more than 100 per cent in the past eight years, and further increases are expected.
- Result in a **reduction in fuel poverty**. Around one in five London households are currently in fuel poverty. This contributed to 2,500 excess winter deaths in London in 2010/11. With fuel prices forecast to rise, this figure will increase unless the energy efficiency of London's housing stock is improved.
- Support and generate **local employment** in the supply and installation of energy efficiency measures. Feasibility studies carried out by Haringey with support from DECC and the GLA estimated that between 500 and 1000 jobs could be created by 2020 in Haringey alone, mostly from the installation of solid wall insulation.
- Lead to a **reduction in carbon emissions** and help to meet councils' statutory requirements in terms of the Home Energy Conservation Act. Over 25 per cent of UK greenhouse gas emissions come from our housing and over 90 per cent of these emissions stem from heating and powering homes that were built before the 1980s. Improving the energy efficiency of our older homes will therefore play an essential part in achieving national emissions reduction targets.

These outcomes can all be used to generate **positive publicity** for councils. For example, Islington Council's fuel poverty initiative 'SHINE' was named the 2013 national winner of the Community Footprint Award Scheme³ and was also awarded the European Prize for Innovation in Public Administration⁴.

The cost of delivering the Energy Companies Obligation (ECO) scheme (and its precursors CERT and CESP) is passed on to consumers, so the cost of these measures impacts Londoners' fuel bills even if their homes do not benefit from measures delivered under the scheme. To keep their energy prices competitive, energy suppliers are also incentivised to keep ECO delivery costs low and will aim to pay the lowest price for projects in order to meet their carbon reductions and bill saving targets. This is also a persuasive reason to minimise delivery costs; use of local powers can help with this by minimising the barriers, many bureaucratic, that delivery agents need to overcome. London received

² Figures for excess winter deaths by individual borough can be accessed at www.ons.gov.uk/ons/publications/re-reference-tables.html?edition=tcm%3A77-277047

³ See article on <http://www.islingtongazette.co.uk>

⁴ See press release on the Islington Borough Council website, <http://www.islington.gov.uk/islington/news-events/news-releases/2013/06/Pages/PR5003.aspx>.

only 4.8 per cent⁵ of all measures installed under CERT, compared to its 12 per cent share of the population, equivalent to a loss of over £480m between 2005 and 2012⁶.

The Government estimates that the ECO will deliver approximately £1.3bn of energy efficiency measures through to March 2015. After this date, the Government is expected to replace ECO with a similar scheme, meaning there will continue to be opportunities to attract significant investment in energy efficiency in the long-term.

Whilst there is no regional target for delivery, the opportunity for London to maximise the ECO funding stream is significant; the region contains 14 per cent of the nation's fuel poor homes, 13 per cent of the Carbon Saving Communities (which part of the ECO funding is targeted at) and 25 per cent of the nation's hard to treat homes. The proportional share of estimated ECO funding that could be spent in London in this phase is £261 million per annum up to March 2015. Unless barriers such as the planning process are reduced, much of the funding in this and subsequent phases will go to other regions.

Reducing these barriers will also encourage Green Deal funded work to take place in London. Other cities have ambitious programmes to maximise Green Deal investment in their housing stock. For example, Leeds City Region has launched what is claimed to be the largest Green Deal scheme in the UK. This £100m initiative will be targeting 12,000 homes in Yorkshire creating up to 600 jobs over three years. Around £20m of this funding will come from ECO, with the remaining coming from Green Deal finance taken out by householders. Meanwhile, in Birmingham, a £600m Green Deal contract has resulted in 24 jobs being created in the first few weeks, with many hundreds more promised⁷.

Comments from two of the delivery agents responding to a survey from this project highlight the potential benefits to the local economy from reducing barriers to investment:

"If the planning process were made easier, more energy efficiency works can be carried out, meaning an economic boost and most importantly greater levels of local employment"

"We currently train 50 apprentices a year. This would increase 300%+ if we could enhance and streamline access to energy efficiency funding and planning/leaseholder consents."

⁵ Figures from Homes Energy Efficiency Database, 2012

⁶ £500m equates to the difference between London gaining 12 per cent share of CERT and its predecessor the Energy Efficiency Commitment (EEC) and London gaining 4.8 per cent. The cost is based on government estimates of delivering the EEC and CERT obligations.

⁷ <http://opinion.publicfinance.co.uk/2013/> Search for Green Deal

3. PLANNING

This section sets out steps that councils can take to help ensure that their approach to planning policy and practice supports and promotes energy efficiency retrofit works, particularly in relation to external wall insulation and conservation areas.

It outlines:

- Why a council's approach to planning matters in encouraging investment in energy efficiency retrofit;
- What steps councils can take to enhance their approach; and
- Case studies on the approaches to planning taken in Haringey and Camden.

The issue

A survey carried out as part of this project found that both councils and delivery agents consider the planning process to be the single most significant barrier to securing funding to improve the energy efficiency of London's housing stock. The survey found that:

- Most councils require planning permission for any external wall insulation, though some have decided that permission is not required in certain circumstances (e.g. street properties in non-conservation areas) or that permission will automatically be granted subject to certain conditions being met⁸.
- All councils require permission for visible measures, including external wall insulation, in conservation areas and it can be very hard to get permission.
- Delivery agents do not have a clear understanding of when planning permission is required and where it is likely to be granted.

Many of the measures that can be installed to help drive down emissions from homes are deemed to be 'permitted development', i.e. not requiring planning permission for installation on non-listed properties outside of conservation areas (or in some cases within conservation areas), as long as there is no applicable Article 4 Direction and certain conditions are met.

London has the highest proportion of properties in conservation areas of any UK city - around 500,000 properties⁹. For these properties, planning permission is required for most works which change the external appearance of the property.

Approximately half of London's dwellings are solid wall (almost 1.6 million properties)¹⁰. The most popular solution for insulating solid walls is usually external insulation (since internal insulation

⁸ NB The survey was carried out before the government's clarification that external solid wall insulation is considered to be an 'alteration' for the purposes of the GPDO - Class A.

⁹ www.eci.ox.ac.uk/research/energy/downloads/40house/background_doc_K.pdf

reduces the size of rooms and often requires householders to move out while it is installed). Since January 2013, external wall insulation is amongst those measures deemed permitted development, subject to certain size and height restrictions, by way of being classed as an alteration under Class A of the General Permitted Development Order 2008. However, this element of permitted development only applies to dwelling houses, where there is no relevant Article 4 Direction and only where the external appearance remains similar.

The secondary business case

Chapter 2 sets out the business for taking action to encourage investment in energy efficiency retrofit in general. There are also specific benefits to addressing planning barriers to retrofit projects.

One key secondary benefit is that the workload of the planning department will be reduced as the process becomes more straightforward. ECO, Green Deal and provisions in the Energy Act 2011 may all result in increases in applications for energy efficiency measures. For instance, the Energy Act 2011 includes provisions to ensure that, from April 2016, private residential landlords will be unable to refuse a tenant's reasonable request for consent for energy efficiency improvements where a finance package, such as the Green Deal is available. In addition, the Act provides for powers to ensure that, from April 2018, it will be unlawful to rent out a residential or business property that does not reach a minimum energy efficiency standard (the intention is for this to be set at EPC rating 'E').

What can councils do?

1. NATIONAL GUIDANCE

The first step to addressing the planning process should be to ensure relevant staff are familiar with national guidance on this topic.

External wall insulation outside of conservation areas

In January 2013, the government issued revised permitted development technical guidance¹¹. This clarifies that external wall insulation should be treated as an improvement and not as an extension and, as such, for installations outside of conservation areas it will be considered permitted development on dwellings, provided that:

- The insulation does not increase the height of the original dwelling; and
- The materials are of a similar appearance to those used in the construction of the exterior of the existing dwellings.

In conservation areas, permitted development rights for measures such as external wall insulation are restricted, with most external work requiring planning permission. The installation of solar PV or solar

¹⁰ <http://data.london.gov.uk/datafiles/housing/tenure-households-borough.xls>

¹¹ www.planningportal.gov.uk/uploads/100806_PDforhouseholders_TechnicalGuidance.pdf

thermal technologies, whilst permitted, have additional conditions which aim to limit their impact on the appearance of the host property¹².

All measures may be subject to an Article 4 Direction which removes Permitted Development Rights, and therefore require planning permission. Where planning permission is required, local planning authorities are to consider the impact of the proposal on the character and appearance of the area.

National Planning Policy Framework

The National Planning Policy Framework states that where a proposed development will harm a 'designated heritage asset', local planning authorities should refuse consent, "unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss"¹³. In other words, the public benefit of any changes (such as reduction in carbon emissions, or reduction in fuel poverty and consequent improvement in health) should be weighed up against any impact on the property's and the conservation area's character and appearance.

2. RAISE AWARENESS AND GENERATE BUY-IN

The next step should be to raise awareness amongst Councillors, senior officers and planning officers about the options for sustainable energy retrofit and why it is so important that the borough's housing stock is made more efficient.

"Many planners may not be aware of the levels of fuel poverty and lack of thermal comfort in the borough which require interventions such as external solid wall insulation. Presenting facts and figures, for example the borough's excess winter death rate, is very effective in helping to develop an evidence base to develop policy and support for measures such as SWI to be installed where appropriate." Minka McInerney, London Borough of Haringey

External wall insulation

Many planning officers and householders will not be familiar with external wall insulation and may not be aware that it has recently been granted permitted development status in certain circumstances. It is therefore important to ensure that planning officers are familiar with the technology and the options for, and pros and cons of, ensuring a 'similar appearance'. This can be achieved through training and site visits.

¹² These relate to PV or thermal on a wall of a building facing a highway

¹³ www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf para 133

CPD training for planners on external wall insulation

Providing training for planners on external wall insulation can help to increase acceptance of this technology. Kingspan, which manufactures external wall insulation, ran a 90 minute CPD training course for the planners and building control officers at the London Borough of Haringey (at no cost to the council). Planners were encouraged to attend by the fact that they received a CPD certificate at the end of the session and it would not take up too much of their time. The CPD event got planners, building control and energy officers to discuss external solid wall insulation. There was excellent feedback from participants and requests for more CPD events related to retrofit.

In parallel with this, it is important to engage with members and senior officers to get buy in. Presenting the business case outlined above will make clear the benefits of taking action in this area. At the end of this document there is a template briefing that can be tailored by your borough for this purpose.

Conservation areas

For conservation areas, training and awareness should cover all visible measures that would require planning permission. Rules regarding which measures require permission are different for domestic and non-domestic properties and depend on where the technology is to be sited. In general, it would be sensible to include the following measures in this training: external wall insulation, double glazing and microgeneration technologies such as solar water heating, photovoltaics and air source heat pumps. English Heritage has provided guidance about suitable retrofit measures for historic and traditionally built buildings¹⁴. It should be noted that, in the case of traditionally built buildings, it is important to understand the particular considerations of these building to ensure that no work is undertaken which could result in damage to the building fabric and/or harm to human health.

3. DETERMINE WHAT REQUIRES PLANNING PERMISSION AND WHAT IS ACCEPTABLE IN YOUR BOROUGH AND DEVELOP APPROPRIATE GUIDANCE

The London Borough of Camden has produced sustainable retrofit planning guidance which clearly sets out the planning procedures that people will need to follow when considering energy efficiency improvements (see case study on page 19) Other boroughs are welcome to tailor this guidance to suit their own circumstances. City of Westminster has also published guidance¹⁵ which provides costs and payback periods for different measures.

External wall insulation

External wall insulation is permitted development for dwelling houses outside of conservation areas, provided that appearance remains similar and there is no applicable Article 4 Direction. Insulation can be produced to match almost any appearance. However, finishes that replicate brick, for example, will be more expensive than a plain rendered finish. A householder or landlord wishing to install insulation that will change the appearance of the property will need to apply for planning permission, unless the

¹⁴ This can be found within the 'Climate Change and Your Home' section of www.english-heritage.org.uk/

¹⁵ www.westminster.gov.uk - search for Retrofit Soho

council implements a Local Development Order to change this. A council may decide that, in certain situations, planning permission will automatically be granted – e.g. on a purpose built blocks of flats, within a conservation area, where materials match the original.

It should be noted that ECO funding can be used for the insulation measure, but cannot be used to fund more expensive finishes than the standard plain render option. So requiring more expensive finishes will mean that landlords or householders have to find other sources of funding to pay for the additional cost of such measures. Councils need to weigh up the importance of leveraging in funding (and the consequent benefits of reduced fuel poverty, job creation etc.) against the benefit of preserving the appearance of the housing stock. It may be decided that a change in appearance is acceptable in some circumstances but not in others. Providing as much clarity as possible about this will encourage delivery agents to develop energy efficiency programmes in your borough.

| Extract from London Borough of Camden's Retrofitting Planning Guidance, Solid Wall Insulation | |
|--|---|
| <p>No Designation</p> <p>Full permitted development applies</p> | <p>Permitted (dwellinghouses only)</p> <p>Conditions:</p> <ul style="list-style-type: none"> • To the front and side elevations – minimal projection is allowed and 'cladding' materials are to be of a similar appearance to those of existing buildings • To the rear – materials used are to be of a similar appearance to the existing dwellinghouse <p>Planning permission required (flats)</p> |
| <p>Conservation Area</p> <p>With or without Article 4 (as the conditions are listed for both categories)</p> | <p>Planning permission required</p> <p>May be acceptable if building has an existing stucco finish with no details and new finish matches.</p> <p>If you wish to improve the insulation of your property, the rear elevation has the most potential. However it is unlikely to be acceptable if:</p> <ul style="list-style-type: none"> • the rear elevation has a detailed design • the rear elevation is part of a uniform terrace • the window and other details cannot be treated sensitively |
| <p>Consideration where planning permission required</p> | <ul style="list-style-type: none"> • Appearance of property and streetscene • Effect on relationship of façade with adjoining properties and terrace • Impact of new materials on long term survival of original fabric and maintenance |
| <p>Listed buildings</p> | <p>Listed building consent required</p> <p>Unlikely to be acceptable due to impact on the historic fabric of the building</p> |

Conservation areas

Working in partnership with relevant planning and conservation officers, you can consider what is likely to be acceptable in your borough. Researching the conservation area appraisals will help to identify what is deemed important in each area. If the brickwork is characteristic and significant within the conservation area, then covering this with uniform-finish insulation will harm the character or appearance of the conservation area and would thus be contrary to borough development policies. However, there may be some less sensitive areas where, provided the insulation replicates the appearance of the original brickwork and other external features such as cill lintel and eaves details, the impact on the conservation area would be minimal and planning permission may be granted. Where stucco is the predominant material, a render finished insulation may, similarly, have minimal visual impact and be considered to preserve or enhance the character or appearance of the conservation area.

Having determined what is acceptable, a Supplementary Planning Document can then be developed to cover retrofit measures in conservation areas, making it clear what is required in planning applications. Options within this include:

- Creating a decision tree to show where permission is likely or unlikely to be granted; and
- Splitting the guidance by archetypes.

The London Borough of Camden has produced detailed guidance on what measures are likely to be considered appropriate in two of its conservation areas (see case study on page 19). The following extract, taken from their Holly Lodge guidance, indicates the circumstances under which external wall insulation may be granted permission.

**Extract from Energy Efficiency Planning Guidance for Holly Lodge Estate Conservation Area
London Borough of Camden**

3.2.1 External solid wall insulation (ESWI) can change the appearance of the area by covering up traditional brickwork and obscuring decorative details in the architecture. It needs planning permission in a conservation area and

- It is unlikely to be acceptable on the front elevation of a building
- It may be acceptable on the side elevation of a building if
 - render is the original finish on that property;
 - it can be applied without the need to extend the roof eaves;
 - original detailing such as tiled cills and drips are reinstated;
 - the junction with the front elevation is a seamless render finish; and
 - the insulation is given a render finish which matches the colour and texture of the prevailing render finish.
- It may not be acceptable on highly exposed flank elevations, for instance at road junctions, where these include windows, doors and decorative detailing whose appearance will be altered by the application of insulation
- It is likely to be acceptable on the rears of properties and their rear extensions where a rendered or painted finish is the prevailing appearance of the conservation area if
 - Render finishes match the colour and texture of the prevailing render or painted finish.

Care will be needed on semi-detached properties to ensure that ESWI does not disrupt the visual symmetry of the building.

Note - total coverage of the external walls, either with external or internal wall insulation - is recommended to avoid leaving cold spots. Whole house solid wall insulation in a conservation area is therefore likely to be a mixture of internal and external insulation.

4. ONGOING ENGAGEMENT WITH PLANNING DEPARTMENT

Ongoing dialogue between sustainability and planning teams is important in ensuring an efficient, joined up approach. Providing householders, housing providers and/or delivery agents with clarity about the following is helpful:

- What information will be required with an application;
- Circumstances under which planning permission might not be granted; and
- Which schemes should be prioritised while others are still being negotiated?

Officers report that involving planners in pre-application meetings can result in a scheme being more likely to be granted planning permission and for this decision to be reached more quickly.

Teams can also work jointly to identify areas that may be particularly suited to ECO investment. For example, purpose built, non-brick blocks of flats or streets of non-brick detached or semi-detached properties may be considered suited to plain-finish external wall insulation.

It may also be possible to identify opportunities for encouraging energy efficiency investment by homeowners through the planning system. The London Borough of Haringey is considering adopting a scheme first pioneered by Uttlesford District Council, which requires cost effective energy efficiency measures to be installed whenever permission is granted for a home extension (see case study below). A list of possible retrofit measures can be found in Camden's document 'Planning Guidance – Sustainability' available on the Camden website.

Case studies

London Borough of Haringey - Energy efficiency improvements required as a condition of granting permission for home extensions

Process

The London Borough of Haringey has set a target to cut carbon emissions in the borough by 40 per cent by 2020 from the 2005 baseline (known as '40:20'). Following adoption of the Local Plan in March 2013, Haringey is in the process of reviewing its Development Management – Development Management Document (DM DPD). This provides an opportunity to consider the inclusion of a policy to support home retrofit within the context of Green Deal and ECO for public consultation. The draft DM DPD includes an option for the development of this policy.



The concept is based on a successful scheme implemented by Uttlesford District Council, which requires applicants seeking permission for extensions to install cost effective energy efficiency measures in their home. Haringey is considering replicating the following simple, pragmatic approach which Uttlesford have developed (full details can be found on the Uttlesford website).

Haringey's building control department's is supportive of the proposed scheme, on the basis that it gives them scope to be involved in projects from an early stage. The housing retrofit officer is currently working with building control colleagues to establish how this scheme could be resourced and whether applicants would be charged a fee

Planning policy advised that an evidence base would be required to justify a policy on consequential improvements. There was also a discussion around the issues that related to implementation of the policy if and when adopted.

continued: London Borough of Haringey - Energy efficiency improvements required as a condition of granting permission for home extensions

Timeframe

Initial discussions between the housing retrofit officer and planning policy commenced in August 2012. The research and development phase of the planning policy, in addition to policies in relation to solid wall insulation, took about three months, with the initial councillor briefing occurring in November 2012. It was agreed that this specific policy could be further investigated and an evidence base developed following adoption of the Local Plan and subsequent development of revised DPD's

However, recently the national planning rules that relate to house extensions have been relaxed. Therefore a key issue to work through now will be to assess how such policies can be effectively implemented in an environment where the local planning authority's influence over the design of many single storey extensions has diminished quite significantly. Thus there will be some work required to consider the feasibility of the proposal in light of these changes.

At the time of publication of this document, the housing retrofit officer was in discussions with development management and planning policy teams about the proposal. The second draft DM DPD is expected to be prepared for public consultation during spring/summer 2014. .

Outcomes

For Haringey's scheme, it is too early to say; discussion is ongoing to assess whether the proposal can be incorporated into the DPD. In the early stages of the Uttlesford scheme, the council looked at a sample of 72 houses that had been subject to the condition. A total of 109 energy efficiency measures were required in the 72 houses including loft insulation in 24 properties, cavity wall insulation in 11 and new boilers in another 11.

Key learning and top tips

Develop the evidence base: it is vital to develop a strong evidence base to support proposed planning policies that require energy efficiency measures, such as consequential improvements. This evidence should take into account the issues that relate to implementation and monitoring.

Implementation of a new policy will have implications for use of resources all the way from evidence base to policy development, implementation and enforcement. The evidence base should include social and economic as well as environmental issues. In Uttlesford, the success of the scheme is attributed to a pragmatic approach that does not ask a great deal from the applicants.

Further information

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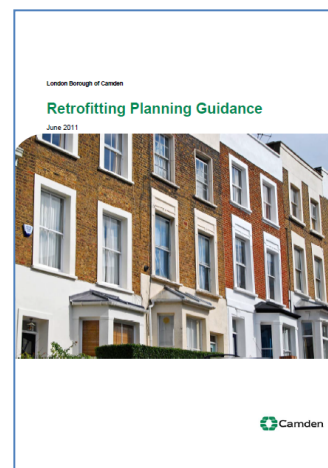
London Borough of Camden – Retrofit planning guidance

Process

The London Borough of Camden has produced 'retrofitting planning guidance' that clearly sets out the planning and building control procedures that people will need to follow in relation to a range of technologies. These include insulation (solid and cavity wall, roof and floor), microgeneration (such as photovoltaics and solar thermal units) and double-glazing. For each technology, it clearly states in which circumstances planning permission is required, split by listed buildings, conservation areas and non-conservation areas.

Timeframe

The guidance was developed between March and June 2011.



Outcomes

For external wall insulation, the following is listed: (This is due to be updated following the government's January 2013 clarifications about external wall insulation.)

It is not possible to say for certain whether the sustainable retrofit planning guidance has increased installations of SWI or other sustainable measures. It has certainly clarified things for applicants who are already considering carrying out such works.

Key learning and top tips

Be clear about planning procedures: The guidance is not designed to encourage any particular energy efficiency measure – rather to set out clearly the planning procedures that people will need to follow. Planners will consider proposals for solid wall insulation in line with adopted policy, including national planning policy, the London Plan and Camden's Local Development Framework.

Further information

The guidance can be downloaded from www.camden.gov.uk. Search for Dartmouth Park guidance.

London Borough of Camden - Sustainable energy technologies in conservation areas

Process

Approximately 75 per cent of the housing stock in the London Borough of Camden is in a conservation area. Camden is keen to encourage householders to increase the energy efficiency of their properties, but recognises that in conservation areas there is a tension between this and preserving and enhancing the character and appearance of these areas.

Within conservation areas, measures such as double glazing, solid wall insulation and microgeneration technologies require planning permission if they do not comply with conditions that seek to minimize the visual impact on the appearance of the area. With Green Deal and ECO about to be launched, applications for these measures are likely to rise, so the council wished to provide information on how to improve energy efficiency in homes without harming the character and appearance of the conservation area.

The council started by focusing on two pilot conservation areas – Dartmouth Park and Holly Lodge Estate. The lessons learnt through this process, as well as the developing research and guidance by other conservation bodies including English Heritage, Society for Protection of Ancient Buildings and the Sustainable Traditional Buildings Alliance will be used to inform forthcoming guidance for residents in all of the borough's conservation areas in 2013.

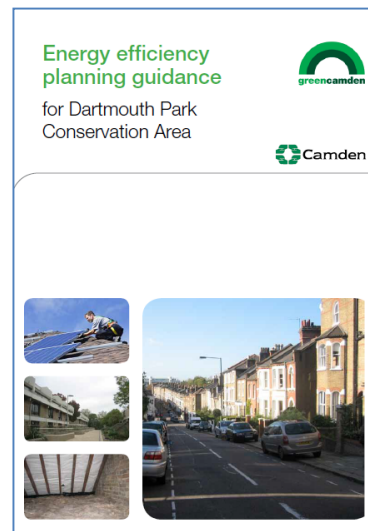
The Dartmouth Park guidance was developed through a working group comprising council officers, representatives from Dartmouth Park Conservation Area Advisory Committee and environmental groups such as local Transition Town groups. English Heritage was also consulted during the engagement process. The environmental and heritage stakeholders started with very different views about what would be appropriate, and the final guidance aims to strike a balance between the issues of both. Most of the guidance was produced by officers, but Rickaby Thompson Associates were appointed to provide additional technical input. The project involved a close partnership between the sustainability and planning teams.

Timeframe

The Dartmouth Park project began in November 2011 and the guidance was formally adopted in September 2012. The Holly Lodge Estate guidance was initiated in the spring of 2012 and adopted in December 2012.

Outcomes

No assessment of the effect on planning applications has yet been undertaken. The council plans to produce borough-wide guidance for conservation areas in early 2013.



continued: London Borough of Camden - Sustainable energy technologies in conservation areas*Key learning and top tips*

Be clear about objectives: be clear with residents about the objectives of the project and revisit and reinforce these as the project progresses. Despite the project objectives of the Dartmouth Park guidance being clearly defined by the working group at the start, some representatives began to feel that the project was a veiled promotion of Green Deal activity and that the guidance should promote less interventionist energy efficiency solutions, such as behaviour change and minor measures, as well. Given that these do not normally require planning permission and the project was principally concerned with the planning policy implications of retrofitting this required some sensitive handling to articulate the project's intention to manage, rather than promote, change within the conservation area.

Third party advice: it is useful to get a third party advisor on the technical side. Solid wall insulation on historic buildings is a contentious issue and having external technical advice will help to embed a more objective sense of the risks and benefits.

Further information

The Dartmouth Park guidance can be accessed at www.camden.gov.uk/ccm/cms-service/download/asset?asset_id=2900917

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How the GLA is planning to help

London Plan policy 5.4 encourages boroughs to develop policies and proposals regarding the sustainable retro-fitting of existing buildings. The Mayor's emerging Supplementary Planning Guidance on Sustainable Design and Construction will provide further details on how this can be achieved.

4. DATA

This section sets out steps a council can take to ensure that its approach to data supports and promotes energy efficiency retrofit works, particularly in relation to housing stock data and benefits claimants' data.

It outlines:

- Why a council's approach to data matters in encouraging investment in energy efficiency retrofit;
- What steps councils can take to enhance their approach; and
- Case studies on the approaches to data taken in Southwark and Haringey.

The issue

A survey carried out as part of this project found that both councils and delivery agents consider that access to or use of data on housing stock and benefits claimants to be a key barrier to securing funding to improve the energy efficiency of London's housing stock. The survey found that:

- Data issues are considered to be the most significant barrier to energy efficiency retrofit by ten of London's boroughs;
- Delivery agents considered data to be a bigger issue than councils¹⁶; and
- London boroughs do not have consistent approaches or policies with regards to using or sharing data to support energy efficiency retrofit projects.

The secondary business case

Chapter 2 sets out the business case for taking action to encourage investment in energy efficiency retrofit in general. There are also specific benefits to addressing data barriers to retrofit projects. For example:

- Having accurate data on the borough's housing stock can enable the council to identify the potential for investment on energy efficiency retrofit in the borough;
- Accurate housing stock data enables the council and the borough's housing stock owners to have informed discussions with energy suppliers and Green Deal providers about potential projects in the borough, enabling investment decisions to be taken with greater confidence;
- Having accurate data about benefits claimants, and being able to use and share it effectively, is critical in enabling the council and its partners to identify which residents are eligible for support for energy efficiency measures;
- Accurate benefits data also enables energy suppliers and Green Deal providers to invest in energy efficiency projects with greater confidence;

¹⁶ Delivery agents rated the significance of data as an issue as 4.31 out of 5 on average. London boroughs rated it 3.93.

- It also drives down search costs and increases take-up rates, enhancing the attractiveness to delivery agents of working in the borough to delivery energy efficiency retrofit works.

What can councils do?

1. UNDERSTAND WHAT DATA IS IMPORTANT FOR ATTRACTING AND ENABLING ENERGY EFFICIENCY RETROFIT INVESTMENT

A first step for councils is to understand what data is important for attracting investment and enabling effective delivery. Two key types of data are particularly important; these are considered in this document:

- a. Housing stock data. Robust data on the borough's housing stock – across all tenures – is important for understanding the energy efficiency investment potential. Information on housing type (e.g. solid wall, cavity wall), its efficiency (e.g. through Standard Assessment Procedure (SAP) scores¹⁷ or Energy Performance Certificate (EPC) data¹⁸), measures (e.g. which homes have not had loft insulation) and situation (e.g. which homes are located in Carbon Saving Community Obligation (CSCO) areas¹⁹, which are located in conservation areas) is valuable.
- b. Benefits data can help councils identify which groups of residents are eligible for support on energy efficiency measures. Under the Home Heating Cost Reduction Obligation (HHCRO) element of ECO, for example, households where a member of the Affordable Warmth Group (AWG) resides are eligible for HHCRO-funded measures. The definition of the AWG is primarily concerned with whether a person receives a benefit from the Government²⁰. So benefits data is a useful tool in enabling councils to identify potential beneficiaries of HHCRO funding in the borough.

The next step should involve engaging with prospective delivery agents to ascertain what types of data are useful for them in determining whether investment could be directed within the borough. This will help determine what data it is particularly important in order to incentivise investment.

The Ofgem web pages on the ECO provide another good source of information²¹. The supplier guidance, *'Energy Company Obligation (ECO): Guidance for Suppliers'*, is a particularly useful

¹⁷ SAP is the methodology used by DECC to assess and compare the energy and environmental performance of dwellings. More information can be found on the UK Government website, www.gov.uk.

¹⁸ EPCs are needed whenever a property is built, sold or rented. An EPC gives a property an energy efficiency rating from A (most efficient) to G (least efficient). More information can be found on the UK Government website, www.gov.uk.

¹⁹ CSCO is part of ECO aimed at encouraging 'area-based' energy efficiency retrofit solutions. DECC guidance defining what areas are eligible is titled *'Energy Company Obligation: Carbon Saving Community Obligation: Rural and Low Income Areas'*. Further guidance explains how to use tools to identify whether an area qualifies for CSCO: *Energy Company Obligation: Carbon Saving Community Obligation – Guidance: How to use online lookup tools to determine whether or not an area qualifies for the Energy Company Obligation: Carbon Saving Community Obligation*. Both guides are available on the UK Government website www.gov.uk.

²⁰ A full explanation of the HHCRO and the AWG can be found in Of gem's *'Energy Company Obligation (ECO): Guidance for Suppliers'*, available on the Ofgem website, www.ofgem.gov.uk.

²¹ See the Ofgem website, www.ofgem.gov.uk.

document for ascertaining which property types, measures, areas and householders are eligible under ECO. Councils should familiarise themselves with this information to consider what data will help them identify where ECO investment could be directed within the borough.

2. ENGAGE WITH KEY DATA HOLDERS AND DECISION-MAKERS

Developing relationships and creating on-going dialogue between sustainability teams and data holders and decision-makers is important to ensuring an efficient, joined up approach.

Within the council, key departments and teams to engage with are likely to be:

- Housing teams (for any council-owned stock and potentially other tenures); and
- Benefits and advice teams (for benefits data).

Other useful teams to engage with include:

- public health (re: knowledge of vulnerable and fuel poor households);
- planners and building control officers (who will know where permission has been granted for improvements);
- the handyperson's service (re: emergency boiler replacements and other energy efficiency upgrades);
- those enforcing the Housing Health and Safety Rating System²² (re: private landlords);
- sustainability (who may hold or have access to housing stock data); and
- corporate (who may have access to centrally-held data).

Other partners outside of the council may also be guardians of valuable data and therefore important to engage with. These include:

- public sector organisations like the NHS (who could help with referrals of eligible vulnerable and fuel poor residents);
- third sector organisations such as Age UK (who could help with referrals of eligible elderly residents); and
- social landlords, who will have intimate knowledge of their housing stock and residents.

It is important to build the business case within these teams and stakeholders: why is collating, sharing and using data important? What benefits can it bring to the council, the borough's residents and other agencies? The business case section in this document can help you to do this.

²² The Housing Health and Safety Rating System (HHSRS) is a risk-based evaluation tool to help local authorities identify and protect against potential risks and hazards to health and safety from any deficiencies identified in dwellings. It can be used to ensure private rented properties meet minimum energy efficiency standards. Furthermore, the Energy Act 2011 contains powers so that from 2016 landlords should not be able to refuse reasonable requests for consent to install Green Deal measures from their tenants. From 2018 landlords should ensure their privately rented properties meet a minimum energy efficiency standard (likely to be set at EPC rating 'E') or that they have installed the maximum package of measures under the Green Deal.

The UK Government website, www.gov.uk, carries a range of guidance on the HHSRS

At the same time build an understanding of the respective priorities and requirements of the different teams' stakeholders. How can attracting energy efficiency investment help achieve their goals? What challenges are there in sharing in collecting, collating and sharing data? How might these be overcome?

3. COLLECT AND COLLATE DATA

Collecting, collating and analysing data is invaluable for understanding the potential for energy efficiency retrofit investment in the borough.

For **housing stock data**, where the borough or its partners do not already hold information (considered in the previous section), what sources of external information can be used to provide a more complete picture? Useful sources of external information are likely to include:

- DECC's National Energy Efficiency Data Framework (NEED)²³, which matches gas and electricity consumption data collected for DECC, sub-national energy consumption statistics and records of energy efficiency measures from the Homes Energy Efficiency Database (HEED) run by the Energy Saving Trust. The Energy Saving Trust provides information on how councils can access and use this free information²⁴;
- EPC data is available from Landmark (see <https://www.epcregister.com/>). Care should be taken to ensure that data is requested in the most appropriate format. For example, a council might want to ask for the data to be supplied 'clean' so that there is only one record for each property, or request that data about recommendations is linked to an address rather than provided separately. Discuss the council's needs with Landmark and identify how the data can be best supplied to meet these; and
- Data on measures installed under the RE:NEW programme is mostly held by boroughs already but the GLA may be able to help supply any missing information: contact Rachael Hickman at Rachael.Hickman@london.gov.uk.

Key issues to consider are:

- Can systems be set up internally and with partners to create a centralised database that collates information on housing stock condition across the borough and across tenures?
- Are there revenue-generating opportunities for sharing data with third parties or through referral fees?
- Internal and external data may not always be complete or at the level of granularity required. However, even incomplete data is better than no data at all;
- The data required often exists somewhere, but time (and sometimes money) is required to collate it and adapt it to your needs. Could the creative use of paid internships help achieve time-intensive tasks (e.g. manually feeding data from EPCs into a database)?

²³ See the UK Government website for more information, www.gov.uk.

²⁴ www.energysavingtrust.org.uk, see web page titled 'Homes Energy Efficiency Database' - <http://www.energysavingtrust.org.uk/Organisations/Government-and-local-programmes/Free-resources-for-local-authorities/Homes-Energy-Efficiency-Database>.

- In what ways can new data be collected from existing and future projects? For example, are there opportunities to collect data on the condition of private housing during door-to-door energy efficiency of fuel poverty projects? Can delivery agents working in the area be required or encouraged to share data on works they have carried out in the area?

For **benefits data**, collating data is often much less of a challenge. The council should hold records of which residents are in receipt of council tax and housing benefits. The key issue, however, is whether the council can share or use this information for other purposes. This is considered in the following section.

4. IDENTIFY WAYS TO SHARE AND UTILISE DATA MORE EFFECTIVELY

Sharing and using data can yield enormous benefits for councils and their residents. However, data protection laws, set out in the Data Protection Act 1998²⁵, are often viewed as a barrier to doing this.

Interpreting the Data Protection Act 1998

The Data Protection Act 1998 came into force on 1st March 2000. Simply put, it states that any data collected should only be used for its intended purpose which must be disclosed to the Data Subject (the person whom you are collecting data about).

As the London boroughs collect personal data and are responsible for determining how they use it, they are, under the terms of the Data Protection Act, the 'Data Controllers' of that personal data. Legally, therefore, they are fully responsible for ensuring that personal data is correctly processed. Ultimately, a council's data protection and legal officers need to be satisfied that their practices are compliant with the Data Protection Act.

Councils interpret the Act in different ways. The research has found that some councils believe that this means they cannot use name and address information to let householders know about energy efficiency grants or financial offers they may be entitled to, as this may be considered unlawful by the Information Commissioner.

Other councils, however, believe that they are allowed to use name and address information from council records for legitimate purposes. For example, one borough officer consulted for this project says that the council:

"...is able to use names and addresses from council tax records if it is in our legitimate interest (which it is) and the addressee won't incur any detrimental effect from our using their data. As people can only benefit from having insulation and keeping their bills down we are covered on this point."

²⁵ Information and guidance on the Data Protection Act 1998 can be found on the Information Commissioner's Office website, www.ico.org.uk.

As the box above highlights, interpretations of the Data Protection Act 1998 vary from council to council. This is perhaps not surprising, given that a council's ability to use benefits data for energy efficiency programmes is very much dependent on what data protection notices were included in the original benefits application process.

Boroughs should check what 'data collection' or 'privacy' notices their benefit teams provided individuals when they originally collected their personal data. Depending on the precise wording, there may be opportunities for contact details to be shared within the authority for the purpose of offering other council services such as energy efficiency retrofit works. If data sharing within boroughs is deemed non-compliant with the Data Protection Act, another option boroughs have used is for information on energy efficiency retrofit to be sent to relevant households directly by benefit teams, subject to any communications or marketing preferences that the data collection notices may have contained.

For further information on data sharing, boroughs should consult the Information Commissioner's data sharing code of practice²⁶.

Provided boroughs are satisfied that it is lawful to share data, there may be ways in which the sharing of this data can be facilitated with third parties. For instance, the Southwark case study (see page 27) highlights an example of a data sharing agreement with the third parties to enable more effective targeting of energy efficiency offers.

Councils could also look beyond the public sector. Private sector organisations regularly share personal data in line with data protection law. Councils could explore these approaches to understand whether there is transferable learning for their own approaches to data.

5. ADOPT A PROACTIVE, FLEXIBLE APPROACH

"Decide what your council's priorities are and what you want to achieve. If you want the investment, make it happen"

London borough officer

Officers and delivery partners interviewed for this research felt that a 'can-do' attitude was a critical component of overcoming data issues. As the quote above highlights, there was a sense that with sufficient political will, pro-activism, flexibility and creativity, data-sharing and utilisation should not be a barrier to delivering effective energy efficiency projects.

The Haringey-London Warm Zones case study (see page 29) highlights how one council has interpreted data protection laws so that the council can work with partners to deliver energy efficiency measures to their most vulnerable residents.

²⁶ The Information Commissioner's code of practice can be found on the Information Commissioner's Office website, www.ico.org.uk. The actual link is: http://www.ico.org.uk/for_organisations/data_protection/topic_guides/data_sharing [accessed 15 July 2013]

Case studies

These case studies offer two interpretations from London boroughs of how data can be used and shared for the purposes of energy efficiency retrofit projects.

London Borough of Southwark: Data sharing agreement

Process

Data has traditionally been one of the most significant barriers to delivering energy efficiency retrofit projects in the London Borough of Southwark. The council's data protection policy meant that the Housing Renewal team could be provided with addresses for mail-outs to vulnerable householders about energy efficiency offers, but not householder names. Without names, response rates to the mail-outs were low; the letters appeared to be circulars and were binned by householders as a result.

To overcome this issue, the Housing Renewal officer worked with the council's legal department to review the issue. The outcome was the development of a data protection sharing agreement.

The agreement facilitates the sharing of data about residents with third parties for the purposes of mail-outs, provided the council is confident that the mail out is compliant with the Data Protection Act. To take an example, if a delivery partner wants to send a letter to residents about an energy efficiency offer, the council itself sends the agreement to the delivery agent's chosen printers. The printers could be in-house or a third party but, critically, the printer must enter into a data sharing agreement with the council. The agreement sets out how the printers will use the data, how long they will store it for and how they will dispose of it after use. Once in place, the council can then release the data directly to the printers or third party agents.

By dealing only with those who are printing the information, this approach reduces the number of people and organisations that handle the information. The agreement is short, just two-pages long, and is therefore easy to review and put in place. It ensures that the council meets its legal obligations under data protection law and enables data to be shared and used securely and efficiently.

Timeframe

It took three weeks to set up the agreement and gain legal and head of service sign off. Another borough could do this more quickly by adapting Southwark's agreement (see Appendix B) and briefing people in advance who need to authorise it.

continued: London Borough of Southwark: Data sharing agreement***Outcomes***

The agreement has been used for an energy efficiency project in Surrey Quays carried out through phase 2 of the RE:NEW programme. A first mailout was sent to 3750 households in receipt of council tax and housing benefits in the target area. These letters did not carry the householders' names. Letters were addressed to the householder and carried the council's branding. The council then got the agreement in place and mailed a further 2000 households in the neighbouring areas and this increased the insulation figures. It meant that over 80 per cent of homes receiving the cavity wall and loft insulation were as a result of the agreement and targeted mailing to named households.

Southwark's officer reported that the agreement worked "very well. We were able to specifically target households we knew would most benefit and we achieved high take up as a result." Take up in the initial target area exhausted, so the project was able to be offered to target households in the wider (neighbouring) areas for insulation only visits too. In total, over 6400 energy-saving measures were installed (e.g. energy monitors, radiator panels, water-saving shower heads, etc.), including 202 loft and cavity wall insulation measures. A success of the targeted mail-out was that 169 of those harder measures took place in the wider areas, resulting in over 80 per cent of the total insulation measures installed.

Key learning and top tips

Build relationships: it is important to build relationships with key decision-makers on data. In this instance, the housing renewal officer established positive relationships with the legal and revenue & benefits departments created an understanding of the issue and a willingness and openness to find a solution.

Further information

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See Appendix B for a redacted copy of the shared data agreement.

London Borough of Haringey - London Warm Zones: a flexible approach to using benefits data

Process

The London Borough of Haringey takes a pragmatic approach to the use of benefits data to progress energy efficiency projects. The approach of the council's fuel poverty officer is to work with other council departments and external delivery partners to define what is needed and enable this to happen.

At the end of August 2012, the council and its delivery partner London Warm Zones wanted to carry out a project to identify eligible Super Priority Group (SPG) householders under the CERT scheme and deliver CERT-funded cavity and loft insulation measures promoting the London Warm Zones scheme which offered up to £200 cash back to any SPG householder willing to take up either of these measures.

The council agreed that if London Warm Zones could fund a mail-out, the council would send out letters to potential eligible householders and work would then be referred back to them. The council sent out 5000 letters to SPG householders. The letters were council-branded, explained the scheme and included free phone to find out more and book a survey. The letters were personalised with the relevant officer's name and number.

Whilst the council could not share names and addresses of the residents they sent letters to, they did provide London Warm Zones with maps indicating how many SPG households were in each Super Output Area in the borough. This enabled assessors to follow-up the letters in key areas. The assessors carried ID, were CRB-checked and notified the council of their movements.

Timeframe

The project was carried out in a short timeframe, beginning at the end of August 2012 and finishing before CERT closed in December 2012.

Outcomes

From the 5000 letters originally sent out by the council, 600 properties were surveyed and 500 measures were installed. In London Warm Zones' experience, these numbers compare favourably to similar projects carried out in the past.

Key learning/top tips

A pro-active attitude: from the council officer's perspective, it is important to have a pro-active attitude. Do not accept no as an answer, make the case internally and search for ways to make things happen: "we just don't put barriers in front of people who want to give us something for free". In this case, benefits data was used to make people aware of an offer whereby they could have insulation installed at no charge and also be paid £100 per measure.

***continued:* London Borough of Haringey - London Warm Zones: a flexible approach to using benefits data**

Developing cross-team working relationships: good relationships within the council are also important. In this instance, the council officer has a good relationship with the senior manager in the Benefits and Taxation team. The manager understands the benefits to the council and its residents about taking a flexible approach to data use and therefore adopts a supportive approach. Through this exercise just fewer than 500 people received free insulation and just fewer than 100 people received at least £100 cash back. Had Benefits and Taxation not provided the data this would not have happened.

Maximising resident's trust in the council and its officers: from London Warm Zones' perspective, the personal involvement of Haringey's fuel poverty officer in the project was critical. Including his name and contact details on the letter to residents lent reassurance and credibility to the offer. Equally, his local knowledge has been helpful in enabling London Warm Zones to target eligible householders.

Further information

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Nigel Turner, Warm Zones Manager, EDF Energy/London Warm Zones, nigel.turner@edfenergy.com

5. LOGISTICS

This section sets out steps that councils can take to help ensure that their approach to logistics supports and promotes energy efficiency retrofit works, particularly in relation to parking and storage.

It outlines:

- Why a council's approach to logistics matters in encouraging investment in energy efficiency retrofit;
- What steps councils can take to enhance their approach; and
- Case studies on the approaches to logistics taken in Islington, Newham and Westminster.

The issue

A survey carried out as part of this project found that both councils and delivery agents consider logistics issues – namely parking and storage – to be a key barrier to securing funding to improve the energy efficiency of London's housing stock. The survey found that:

- Parking was seen as a less of an issue by some outer London boroughs, compared to those in inner London. This was a view shared by delivery agents;
- Five boroughs considered parking to be their biggest barrier, including one outer London borough;
- Four boroughs rated storage issues as their most significant barrier; and
- Delivery agents considered logistics issues to be bigger barriers to retrofit than councils.

The secondary business case

Chapter 2 sets out the business case for taking action to encourage investment in energy efficiency retrofit in general. There are also specific benefits to addressing logistics barriers to retrofit projects. For example:

- Helping delivery agents to bring down the costs of storage, welfare and parking for projects will help them to make more cost-effective offers to borough residents and free-up more ECO costs for the measures themselves; and
- Making land or facilities available to delivery agents for storage and welfare purposes could generate revenue for the council.

What can councils do?

1. IDENTIFY POTENTIAL STORAGE AREAS ACROSS THE BOROUGH

Sites and facilities can be useful for a range of purposes during energy efficiency retrofit projects, including:

- Storage of materials, vehicles and other installation equipment; and
- Welfare facilities, such as an on-site office, toilets, changing rooms etc.

Review potential sites and facilities across the borough that could be used by energy efficiency project contractors. Consider different sizes and types of land and facilities that might be available for different project types. Welfare facilities for a small project, for example, may only require enough space for a small portacabin. A large-scale, area-based solid wall insulation project, however, may require significant space for storage of insulation materials and vehicles.

Within the council, contact teams with responsibilities for facilities, corporate property and housing who may be able to help identify whether there are any suitable pieces of land or facilities that could be utilised. In Islington, for example, a search revealed that the council had large piece of derelict land that could be used for storage (see case study on page 35).

To help build the business case, consider what benefits the council might be able to secure through offering the use of its own land or facilities to contractors. For instance:

- An offer of free or low cost land or facilities might tip the balance in favour of securing investment from a delivery agent;
- The council could recoup maintenance or security costs (see the Islington case study) in return for the use of land and/or facilities;
- There might also be income opportunities through entering into a commercial rental agreement e.g. leasing properties and voids to contractors to use as welfare facilities for their staff.

Potential sites and facilities may also be available from partners in the public, private and third sectors. Public sector bodies might have mutual interests in making land or facilities available. Bodies such as the NHS, for instance, have a vested interest in reducing fuel poverty as this in turn reduces the costs of treating cold related illness. Community organisations might be able to realise income opportunities through leasing their land or facilities.

Key principles to consider include:

- Be proactive: be aware of land and facilities that are available at any given time;
- Think ahead: think about where projects are likely to happen (e.g. suitable CSCO areas) and think about suitable land or facilities that could be offered in those areas;
- Be flexible: think creatively about ways in which land or facilities might be used to make energy efficiency projects more attractive to energy companies and other investors;
- Be timely: respond to requests for storage space and facilities quickly. Being aware of what is available will help facilitate this; and
- Develop a package: roll any storage or facilities offers into a wider portfolio of benefits that the borough can offer to prospective delivery agents.

2. EXPLORE WAYS IN WHICH PARKING POLICY CAN SUPPORT ENERGY EFFICIENCY RETROFIT

The (perceived) cost and hassle involved in parking is a commonly perceived barrier to delivering energy efficiency retrofit projects in London. Taking a proactive approach to parking, removing the 'hassle factor' and reducing costs can therefore help ensure your borough is more attractive to prospective delivery agents.

Explore ways in which your council's approach to parking can support energy efficiency retrofit projects. Parking space is often at a premium, particularly in inner London areas. However, the benefits of removing parking barriers could be significant for the borough and its residents if it encourages greater investment in energy efficiency activity.

What scope is there to offer attractive parking propositions to potential delivery agents?

- Can permits be offered that allow waivers and exemptions in controlled zones?
- For large-scale projects, can permits be offered across the borough or across the relevant parking zones?
- Can the council offer a quick, efficient service, for example offering a quicker turnaround for applications for permits, suspensions or waivers relating to key energy efficiency projects?

It is worth considering parking arrangements that are already in place with other services and contractors. For example, one London borough identified what arrangements were in place for the council's tree service contractors and brought forward a similar system for energy efficiency delivery. Lessons and solutions from other services could be transferred to energy efficiency contractors.

Parking charges can be an important revenue stream for councils. When making decisions about parking budgets, however, could a reduction in parking charges to energy efficiency contractors be weighed up against the potential investment this might bring into the borough?

Another barrier to changing parking policy might be that parking services are contracted out to a third party. If this is the case, consider what opportunities there might be for building provisions into procurement contracts that support the delivery of energy efficiency projects in the borough.

As with storage, think about how action on parking can be added to any overall package to prospective delivery agents.

3. DEVELOP RELATIONSHIPS WITH KEY COUNCIL TEAMS AND EXTERNAL PARTNERS

Engaging with key teams or departments within the council, such as those with responsibilities for parking, housing, facilities management and corporate property, as well as potential external partners from the private and public sectors, is important for maximising opportunities to removing logistics barriers.

Developing a shared understanding of the benefits of taking action between sustainability teams and key logistics teams can help foster a sense of joint purpose. Make the business case for why action on energy efficiency is important to the council and borough, but also understand the particular goals and priorities of the team concerned. How can energy efficiency works help achieve these priorities? How can what they currently do be adapted to support energy efficiency action?

Developing and maintaining relationships outside of the council is also important:

- Public, private and third sector organisations might be able to provide support in enhancing the borough's 'logistics' offer, for example by offering storage or parking space;
- Developing relationships with the supply chain can enable the council to take a collaborative approach to identifying logistics needs and actions to enhance the 'offer' to prospective delivery agents. For example, Islington made storage space available as part of a wider package to attract ECO and Green Deal investment in the borough (see case study below).

Case studies

London Borough of Islington: identifying and implementing logistics solutions to retrofit

Process

The London Borough of Islington carried out a high-level analysis of opportunities on energy efficiency retrofit at the end of 2012. The borough has historically experienced difficulties in attracting investment under previous energy company funding schemes for energy efficiency²⁷.

The composition of the borough's housing presents particular challenges; 81 per cent of homes in the borough are flats, 40 per cent of homes are located in conservation areas, and there are very few hard-to-treat cavities left to fill. But there are also opportunities under ECO; the borough has over 13,700 solid wall properties in their own council housing stock and 42 Carbon Saving Community Obligation (CSCO) areas.

The council has undertaken work to develop a 'package' to attract ECO investment in the borough in order to maximise these opportunities. The package includes solutions to logistical issues that are commonly identified by potential delivery partners: storage and parking.

Storage was an issue identified under a previous solar photovoltaic project in the borough, where finding land to securely store panels and vehicles had become problematic.

To address the issue, the council's energy projects officer contacted the facilities team and the corporate property team to see if there was any suitable land. A search by these teams revealed that the council owned a large piece of derelict land fenced off that did not yet have change-of-use planning permission. As a result of previous squatting the land required 24 hour security making it an ideal storage facility.

The council made it available for future energy efficiency retrofit schemes. In return, contractors using the land would be required to pay for the security of the land whilst using it.

On parking, the council reviewed its previous schemes to see how it could address parking issues, which had been perceived as barriers to delivery by contractors. The process was facilitated by the fact that energy services sits within the same department as parking within the council.

The approach developed is that where possible, the council aims to use estate parking for smaller, shorter contracts (e.g. 2 to 3 months). For longer works, the council will issue an agreed number of parking permits to contractors, transferable between vehicles. The permits can be used for on-street parking, include waivers and can be used in any zone.

²⁷ However, it got the highest level of funding in the country from the Homes and Communities Agency *Social Housing Energy Saving Programme* to carry out insulation in social housing.

***continued:* London Borough of Islington: identifying and implementing logistics solutions to retrofit**

As part of its review, the council has also looked at how parking works for tree service services. Tree service contractors use parking suspensions to carry out works. These require more organisation (10 to 14 days lead-in time) but would often be more suitable for energy efficiency works within an inner London boroughs as even where contractors have parking permits there will often not be a space available where required.

Timeframes

Storage: the council's facilities and corporate property teams were able to carry out a search of council facilities and land within a couple of working days.

Area Housing Offices have been able to sort out Estate Parking Permits with 2 days' notice and Parking Services have issued waiver for individual vehicles carrying out short-term energy efficiency works in a similar timeframe.

Outcomes

Storage: the council used the land identified for a CERT scheme at short notice at the end of 2012. However, the land is now ear-marked for development and a change-of-use planning permission will be obtained in the next few months after which it will no longer be available for storage.

Parking: short-term on street parking waivers for individual vehicles and estate parking permits have been issued in 2013.

Key learning and top tips

Engage with key teams, review the opportunities: liaise with facilities and corporate property teams to make the business case and explore opportunities to use un- or under-used land or facilities. Land could even be rented out to contractors at a competitive price to secure income for the council or at least cover maintenance and security costs. Similarly, engage with parking teams to explore how parking policy can be adapted to remove the 'hassle factor' for contractors. Review how parking permits are applied to other key services (e.g. tree services) to see if lessons can be learned for energy efficiency retrofit projects.

Further information

Richard Gill, Energy Projects & Programmes Officer London Borough of Islington,
Richard.Gill@islington.gov.uk, 020 7527 7265

Approaches to parking in London: Newham and Westminster

A number of different boroughs that were interviewed revealed that there are different experiences to parking across London, as the approaches taken by Newham and Westminster demonstrate:

London Borough of Newham

In Newham, the council offers two different routes for contractors working within the borough to obtain parking permits if the area of the scheme is within a Controlled Parking Zone (CPZ).

1. Business parking permits are available for companies with a registered head office in the borough and are valid for 3, 6 or 12 months. At the time of writing, these cost £150, £300 and £500 respectively per vehicle. For companies outside the borough, if they are working for or on behalf of the council then the council can apply for these permits on behalf of the contractor.
2. The second option is trade permits, which are £2 a day or £10 a week and also allow parking in any controlled zone. These can be applied for by the contractor or the landlord or owner/tenant of the property upon presentation of proof of works.
3. Any resident in a CPZ can apply for up to 40 visitor “scratch cards” in any calendar month. There are three different types of cards: 6 hourly, 10 hourly and 24 hourly. The 6 hour cards are sold only in books of 10 costing £10 (i.e. £1 per card), the 10 hourly cards are sold only in books of 5 costing £15 (i.e. £3 per card), and the 24 hour cards are sold only in books of 5 costing £25 (i.e. £5 per card). Although these may appear to be cheaper than the trade permit, residents are sometimes reluctant to give these to contractors, as they are limited to 40 cards per month.

It should be recognised that parking is not as much of an issue for contractors as it can be in inner London boroughs, where there are more controlled parking zones.

The council recognises that it is possible that any costs passed on to contractors in the form of parking charges can then get passed on to the householders themselves. However the Newham policy of charging for permits is standard and non-negotiable.

City of Westminster

In contrast to Newham, Westminster is an inner London borough, where parking space is at a premium. The council offers trades permits which allows tradespeople (such as plumbers, heating engineers etc.) who are carrying out works or services to premises within Westminster to park in resident, Pay and Display, and Pay by Phone parking bays at a discounted rate of approximately 20%.

Further information

Rob Ballington, Domestic Energy Efficiency Officer, London Borough of Newham,
rob.ballington@newham.gov.uk, 020 3373 4892

Westminster City Council’s website (www.westminster.gov.uk) outlines its policy on trades permits.

APPENDIX A.

INTERNAL BRIEFING

TEMPLATE

This briefing paper is designed to be adapted for use by council officers in briefing papers to Members, senior management and others. It sets out the key messages from the toolkit, presenting the business case for action and key steps a council can take on the issues of planning, data and logistics.

Briefing on Using Local Powers to Maximise Energy Efficiency Delivery

The Greater London Assembly has developed a toolkit to help London's councils identify and implement solutions to help attract investment and delivery for energy efficiency measures. It focuses on three commonly cited challenges: planning, data and logistics.

The business case for action

The toolkit makes it clear that there would be substantial benefits for **[insert council name]** and the borough as a whole, if the council adopted some or all of the actions that it highlights. These actions could:

- Help to **minimise fuel bills** – particularly important at a time when welfare benefits are being reduced. Energy bills have increased by more than 100 per cent in the past eight years, and further increases are expected.
- Result in a **reduction in fuel poverty**. Around one in five London households is currently in fuel poverty. This contributed to 2,500 excess winter deaths in London in 2010/11 and **[insert figure]** excess winter deaths in **[insert borough name]**²⁸. With fuel prices forecast to rise, this figure will increase unless the energy efficiency of London's housing stock is improved.
- Support and generate **local employment** in the supply and installation of energy efficiency measures. Feasibility studies carried out by Haringey with support from DECC and the GLA estimated that between 500 and 1000 jobs could be created by 2020 in Haringey alone, mostly from the installation of solid wall insulation.
- Lead to a **reduction in carbon emissions** and help to meet councils' statutory requirements in terms of the Home Energy Conservation Act. Over 25 per cent of UK greenhouse gas emissions come from our housing and over 90 per cent of these emissions stem from heating and powering

²⁸ Figures for excess winters deaths by individual borough can be accessed at www.ons.gov.uk/ons/publications/reference-tables.html?edition=tcn%3A77-277047

homes that were built before the 1980s. Improving the energy efficiency of our older homes will therefore play an essential part in achieving national emissions reduction targets.

These outcomes can all be used to generate **positive publicity** for councils. For example, Islington Council's fuel poverty initiative 'SHINE' was named the 2013 national winner of the Community Footprint Award Scheme.

Substantial amounts of funding are available to improve the energy efficiency of older homes through programmes such as the Energy Company Obligation (ECO) and Green Deal; £261m per annum (nearly £8m per borough) that would be London's fair share of ECO.

What can [insert council name] do?

The GLA toolkit sets out a range of steps that councils can take to enhance the amount of energy efficiency retrofit activity in the borough. The following steps in particular, could help **[insert council name]** build on its existing work on energy efficiency retrofit and maximise investment:

[Select some or all of the following actions, depending on what is most appropriate for your council. The actions below are based on the steps set out in each chapter of the toolkit. You may wish to review these steps and pick out more specific actions that the council could take for each]

Planning

1. Understand national regulations (General Permitted Development Order). This, for instance, states that external wall insulation is permitted development for dwelling houses (subject to certain conditions) except for listed buildings and conservation areas. In conservation areas, councils need to weigh up the public benefit that would arise from changes against any detriment to amenity.
2. Raise awareness, through training and site visits, amongst planners, senior officers and members, of the drivers for improving energy efficiency and the technical options for doing so.
3. Determine what's appropriate in the borough and issue guidance that makes it clear what is likely to be acceptable, both within and outside of conservation areas.
4. Set up processes to ensure there is on-going engagement between planners and sustainability officers to ensure an efficient, joined up approach.
5. Consider options to encourage energy efficiency investment through the planning system, for example by requiring cost effective energy efficiency measures to be installed as a condition of getting permission for an extension.

6. Identify areas where external wall insulation could be installed relatively easily and work with energy suppliers to ensure ECO funding to insulate these areas.

Data

1. Review what data is important for attracting and enabling energy efficiency retrofit investment.
2. Ensure that key data decision-makers and holders within the council and externally understand the business case of encouraging energy efficiency retrofit and identify ways in which they can help facilitate future investment.
3. Identify how the council can collect and collate relevant housing data and benefits claimants data more effectively, in order to understand and analyse key data in relation to energy efficiency.
4. Identify ways in which data can be shared more effectively within the council and with external organisations **[can the council adopt or adapt Southwark's data sharing agreement, see Appendix B?]**.

Logistics

1. Identify whether the borough owns, or has access to, land and/or property that could be used as a temporary storage or welfare areas for installers.
2. Identify ways in which parking permits can be accessed (a) simply, and (b) cost-effectively, by delivery agents. Review existing solutions that can be adapted for energy efficiency contractors (e.g. the arrangements for tree service contractors).
3. Ensure that key logistics departments within the council (e.g. facilities management, parking services, housing services), as well as relevant external partners and the supply chain, understand the business case of encouraging energy efficiency retrofit. Identify ways in which these teams can help facilitate future investment in energy efficiency retrofit.

APPENDIX B.

SOUTHWARK DATA

SHARING

AGREEMENT

This is a redacted copy of the data-sharing agreement used by the London Borough of Southwark for a RE:NEW retrofit project (see case study on page 27).

Councils are welcome to adapt this for their own use.



Information Sharing Agreement

| | |
|--|--|
| Document Owner (Asset Owner) | London Borough of Southwark |
| Document Author and Enquiry Point of Contact for the purposes of which the information is being shared | Name and department of Document author/ contact |
| Document Authoriser | London Borough of Southwark, Contracts Team, Legal Services |
| Review Date of Document | |
| Version | |
| Document Classification | |
| Document Distribution | xxx – Southwark Council Name of printers/ 3 rd parties' details – to be inserted |
| Document Retention Period | |
| Next Document Review Date | |
| Start Date | |
| End Date | |

You _____ the data processor agree to handle all data in accordance with The Data Protection Acts 1984 and 1998.

The data processor should note that this information is not to be disclosed to any third party by virtue of category 3 of paragraph 10.4 of the Access to Information procedure Rules of the Southwark constitution.

The resident details enclosed in the attached secure file are people who are eligible for a detailed home energy assessment which will provide support and guidance in order to reduce the energy costs in their home. [This information can be revised depending on the use of the data/ particular scheme to be offered].

As the company printing and designing the mailout you agree to the following:

- Data will be handled in a professional and appropriate manner following the principles of ISO 27001
- Data will only be used for the agreed purposes and not be passed or used by any other associated company, nor will the data be used to market any commercial services or products
- You confirm that you have a full security process whereby any spoilt addresses/ returns are securely destroyed
- Once the mailing has been completed the data will be destroyed.

Specific detail regarding these terms is provided below:

_____ responsibilities when in receipt of our information

For the purposes of the Data Protection Act 1998 (the "Act"), the parties agree that the London Borough of Southwark ("LBS") is the Data Controller, and XXXXXXXXXXXXXXXX, trading as _____ is the Data Processor with respect to the Personal Data LBS transfers to _____ for the purposes of market research/ mailings. Whilst processing the Personal Data _____ warrants that:

- ❖ It will not use the Personal Data for any purposes other than those detailed above
- ❖ It will not disclose the Personal Data to a third party in any circumstances other than at the specific written request of the LBS.
- ❖ It will employ appropriate operational and technological processes and procedures to keep the Personal Data safe from unauthorised use or access, loss, destruction, theft or disclosure. The organisational, operational and technological processes and procedures adopted are required to comply with the requirements of ISO/IEC 27001:2005 (ISO/IEC 17799:2005) as appropriate to the services being provided to LBS. LBS will use ISO/IEC 27002:2005 as a basis for auditing compliance with the guarantees _____ provides in relation to this obligation;
- ❖ It will not keep the personal data on any laptop or other removable drive or device unless that device is protected by being fully encrypted, and the use of the device or laptop is necessary for the provision of the services under this agreement.
- ❖ It will ensure that only such of its employees who may be required by it to assist it in meeting its obligations under the Agreement shall have access to the personal data.

- ❖ It will notify LBS of any information security incident that may impact the processing of the personal data covered by this agreement within two working days of discovering, or becoming aware of any such information security incident.
- ❖ It will ensure that the personal data is **securely** removed from systems and any printed copies securely destroyed at the end of this work, or on termination of the contract. **Under no circumstances should paper documents containing personal data or confidential information be simply binned or deposited in refuse tips.** In complying with this clause, electronic copies of the personal data shall be securely destroyed by either physical destruction of the storage media or secure deletion using appropriate electronic shredding software that meets HM Government standards.

The London Borough of Southwark reserves the right upon giving reasonable notice and within normal business hours to carry out compliance and information security audits of ____ in order to satisfy itself that ____ is adhering to the terms of this agreement.

This Agreement shall be governed by and interpreted in accordance with the laws of the United Kingdom.

Name _____

Name

Job Title _____

Job Title

Date _____

Date

**On Behalf of
London Borough of Southwark**

On Behalf of ()

Other formats and languages

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Chinese

如果需要您母語版本的此文件，
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Hindi

यदि आप इस दस्तावेज की प्रति अपनी
भाषा में चाहते हैं, तो कृपया निम्नलिखित
नंबर पर फोन करें अथवा नीचे दिये गये
पते पर संपर्क करें

Vietnamese

Nếu bạn muốn có văn bản tài liệu
này bằng ngôn ngữ của mình, hãy
liên hệ theo số điện thoại hoặc địa
chỉ dưới đây.

Bengali

আপনি যদি আপনার ভাষায় এই দলিলের প্রতিলিপি
(কপি) চান, তা হলে নিচের ফোন নম্বরে
বা ঠিকানায় অনুগ্রহ করে যোগাযোগ করুন।

Greek

Αν θέλετε να αποκτήσετε αντίγραφο του παρόντος
εγγράφου στη δική σας γλώσσα, παρακαλείστε να
επικοινωνήσετε τηλεφωνικά στον αριθμό αυτό ή ταχυ-
δρομικά στην παρακάτω διεύθυνση.

Urdu

اگر آپ اس دستاویز کی نقل اپنی زبان میں
چاہتے ہیں، تو براہ کرم نیچے دئے گئے نمبر
پر فون کریں یا دیئے گئے پتے پر رابطہ کریں

Turkish

Bu belgenin kendi dilinizde
hazırlanmış bir nüshasını
edinmek için, lütfen aşağıdaki
telefon numarasını arayınız
veya adrese başvurunuz.

Arabic

إذا أردت نسخة من هذه الوثيقة بلغتك، يرجى
الاتصال برقم الهاتف أو مراسلة العنوان
أدناه

Punjabi

ਜੇ ਤੁਹਾਨੂੰ ਇਸ ਦਸਤਾਵੇਜ਼ ਦੀ ਕਾਪੀ ਤੁਹਾਡੀ ਆਪਣੀ ਭਾਸ਼ਾ
ਵਿਚ ਚਾਹੀਦੀ ਹੈ, ਤਾਂ ਹੇਠ ਲਿਖੇ ਨੰਬਰ 'ਤੇ ਫ਼ੋਨ ਕਰੋ ਜਾਂ ਹੇਠ
ਲਿਖੇ ਪਤੇ 'ਤੇ ਰਾਸ਼ਤਾ ਕਰੋ:

Gujarati

જો તમને આ દસ્તાવેજની નકલ તમારી ભાષામાં
જોઈતી હોય તો, કૃપા કરી આપેલ નંબર ઉપર
ફોન કરો અથવા નીચેના સરનામે સંપર્ક સાધો.

