

Draft New London Plan

A response from Ashden

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Introduction

Ashden welcomes the Mayor's publication of a draft new London Plan. As it acknowledges, planning has a vital and positive role to play in changing the city for the better. The focus of our response is ensuring that the Plan will support London's transition to a low carbon, zero emissions city that is resilient to climate change.

About Ashden

[Ashden](#) is a charity that supports sustainable energy, transport and built environment leaders who are transforming lives and tackling climate change in the UK and across the globe. Our rigorous annual Awards scheme uncovers the best in sustainable energy and showcases their potential, with over 85 UK pioneering organisations receiving awards to date. Uniquely, we continue to work with our winners after they have won, helping them scale up their work and sharing their learning with others.

Our vision:

Is of liveable cities where people want to live and work – unpolluted well-planned cities powered by sustainable energy and clean technologies; with warm energy-efficient homes, workplaces and public buildings; boasting low-carbon transport systems and green infrastructure.

Why:

Futureproofing our cities through low-carbon transformation will lead to environmental benefits, such as reduced emissions and resilience to climate change. It will also deliver positive socio-economic outcomes including improved health through clean air, green space, healthy buildings and sustainable transport; employment opportunities through locally owned energy, retrofit and renewables; and thriving, inclusive neighbourhoods.

How:

Drawing on pioneering Ashden Award winners, we can show decision makers, policy makers and funders that solutions already exist, and that through collaborative learning, sharing and co-design they can be deployed quickly and at a scale that will allow ambitious targets to be met. This can be delivered on a national, regional or local level.

What Ashden can offer

A diverse expert network: our award winners have invaluable collective expertise in helping people and businesses to use energy more wisely. They are drawn from a range of sectors including charities, businesses, local authorities and SMEs.

A bridge between policy and practice: Ashden winners are developing and delivering the innovations that are required to reach a zero carbon world. We highlight their work to national, city and local decision makers so that policy supports and accelerates their impact and responds to the barriers and opportunities that winners identify. Ashden's current focus is working with city region leaders and decision makers, such as the London Mayor and metro mayors around the country.

Supporting change – connections and interventions: Ashden's strength is facilitating connections, such as, between the GLA and organisations which offer solutions to issues it identifies. We work closely with the GLA environment team to do this and are happy to do so on the planning side where useful. This can include hosting events, roundtables and other interventions to encourage learning transfer.

Seeing is believing: There is power in seeing solutions in action, which could be replicated or scaled up to deliver significant carbon savings to London. We have a history of running engaging and eye opening 'seeing is believing' tours that bring decision-makers and Ashden Award winners together. We are already in discussion to put one of these tours together for GLA decision makers, and look forward to ensuring that it focuses on key aspects of the environment strategy and London Plan and offers new insights for participants.

Wider Ashden networks

Fit for the Future network: Ashden also has access to a wider network of organisations through our [Fit for the Future Network](#), run in partnership with the National Trust. It supports organisations that have a large property portfolio and want to reduce energy bills and better manage environmental impacts. More than 100 members have joined the network in the past three years. Collectively they have saved 14,657 tonnes of CO₂ in 2015 alone, over 40,000 buildings.

LESS CO₂: Finally, Ashden also runs the [LESS CO₂](#) sustainable schools programme, which is a free energy efficiency programme available to any UK school. Through half day workshops across the year, peer mentoring, expert advice and resources, staff are empowered and equipped to make changes and improvements to their school, reducing their energy usage, saving money on bills and lowering their CO₂ emissions.

Detailed response

<p>1.0.9 – the 6 Good Growth Policies</p>	<p>We welcome the draft Plan’s recognition that economic growth needs to enable positive change in the city. Failure to examine the consequences of growth has led to congestion, poor air quality and an undersupply of the homes that Londoners urgently need.</p> <p>However, sustainability, and the need for growth to enable a low carbon transition and to harness the opportunities of it, doesn’t come across in the Plan as a fundamental principle that will inform planning decisions in the city. The focus on sustainability is reduced to technical aspects about building efficiency under Good Growth Policy 6 on increasing efficiency and resilience, and to the sustainable infrastructure policies.</p> <p>We would like to see sustainability embedded throughout the Plan and reflected in the overarching vision of ‘good growth’ that it presents and aims to</p>
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	<p>realise (1.07. and 1.0.8). In the process of London transitioning to a zero carbon city by 2050 we will tackle congestion, gain cleaner air and green infrastructure, make homes more affordable to heat without health side effects and increase access to clean, renewable energy. Sustainability should therefore be presented as an overarching ambition of the London Plan and reflected in various aspects of it, rather than as a siloed, technical issue to do with building efficiency. We note various places in which this can be achieved in our comments below.</p> <p>Where there is a focus on the technical aspects of efficiency standards and the like on buildings, they should be presented as critical and essential steps in London’s transition to a zero carbon city and all the benefits which that offers, rather than as barriers which developers need to overcome, and which are presented in equivocal language. We provide specific notes below on the areas in which this could be achieved, but a more positive framing of requirements that will help to secure the benefits of a zero carbon London would be of benefit across the whole Plan.</p>
<p>1.1.4</p>	<p>As an example of embedding sustainability objectives into the Plan, the following paragraph could feature sustainability as an additional key objective (text in bold is our addition):</p> <p><i>“Delivering efficient good quality, affordable homes, better public transport connectivity, accessible and welcoming public space, a range of workspace in accessible locations, and social, physical and environmental infrastructure that meets London’s diverse needs is essential if London is to maintain and develop strong, and inclusive, sustainable and resilient communities.”</i></p>

<p>Policy GG4: Delivering the homes that Londoners need, p.19</p>	<p>Homes will have to be built to high sustainability standards if London is to meet its zero carbon ambition. Homes will need to be affordable to buy <i>and</i> to warm, and should not continue to push up London’s carbon emissions. Managing the additional emissions that they create will be best achieved by designing in sustainability from the start, in a way which guarantees performance when in use.</p> <p>Therefore, it is essential that sustainability is reflected in both the focus on homes in the London Plan and the section on design. The high level text that sets out Policy GG4 on p.19 should include reference to high sustainability standards. For example, it should state that new homes should support London’s transition to zero carbon by 2050.</p>
<p>Policy GG5: Growing a good economy, p.21</p>	<p>The text for this policy includes most aspects of a strong, inclusive and ‘good’ economy, such as housing, supporting innovation, and nurturing culture. Sustainability is missing on that list. A ‘good’ economy for London must inherently be a low carbon one, which has taken advantage of the growth opportunities of the transition. If we fail to tackle climate change and ensure that homes, commercial and public buildings are sustainable, then rising energy costs and the costs of dealing with the impacts of unabated climate change will stymie London’s economic growth.</p> <p>Therefore, the text on the good growth policy 5 should make it clearer that those involved in London’s planning and development should be aiming to support the transition to a zero carbon London by 2050, alongside the other important aspects of good growth which the policy already features.</p>

<p>Policy GG6: Increasing efficiency and resilience, p.23</p> <p>AND</p> <p>1.5.1 – 1.5.7</p>	<p>GG6 main text: The wording for this policy should set a clearer and stronger expectation for planners and developers that all development in London contributes towards the city becoming zero carbon by 2050.</p> <p>Where it does address energy efficiency, the language should be less equivocal, making the expectation on developers clearer and stronger. For example:</p> <p><i>“Seek to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero carbon city by 2050.”</i></p> <p>1.5.1 – 1.5.7 text: The text which precedes the GG6 policy itself is very negative in tone, focusing on threats and limits. The threat of climate change is of course central to London’s ambition to become zero carbon by 2050. But the opportunities the transition offers for making London a cleaner, more pleasant, resilient and economically stronger place to live, also inform this vision. None of that comes across in 1.5.1 – 1.5.7. It should be more positively framed, so that planners and developers can see how development can contribute positively to London’s move to being zero carbon.</p>
<p>Policy SD1: Opportunity areas</p>	<p>This policy states an expectation that all opportunity areas facilitate ambitious transport mode share targets. Similarly, the policy should state an expectation that all opportunity areas positively contribute to London’s transition to being a zero carbon city by 2050.</p>
<p>Policy D1: London’s form and characteristics</p>	<p>Policy D1 main text: Remove equivocal language:</p> <p>Policy D1 B 3) should read: <i>“Aim for Have high sustainability standards.”</i></p>

AND

3.1.1 – 3.1.9

The language and expectation is clear in regard to every other criterion except this one. If London is to achieve its zero carbon ambition by 2050, merely aiming for high sustainability standards will not be sufficient.

3.1.1. – 3.1.9 text: These paragraphs set out in some detail the different ways in which good design can help to achieve wider outcomes, such as reduced crime, exposure to poor air quality and improved access to active travel. The same is true of design and sustainability. With large numbers of homes and commercial developments expected in London, the simplest way of ensuring that they are low impact when built and when in use, is by designing in low energy use.

Ashden winners the [PassivHaus Trust](#) and the building standard they promote exemplifies this approach. Homes built to a Passiv standard can deliver zero emissions and guarantee the avoidance of overheating in summer and excessive energy demands in winter. A PassivHaus building often only costs a few per cent more in capital terms than a standard one and will be cost neutral in lifetime costs, whilst at the same time achieving its design targets for energy, ventilation and summer comfort.

This section of the London Plan should therefore reinforce the ways in which design can build in a commitment to London's zero carbon ambitions and, when approached ambitiously, guarantee energy performance when in use as well.

Omitting this is an oversight and contributes to the sense that sustainability is a technical issue that is relevant to only one aspect of the London Plan.

<p>Policy D4: Housing quality and standards</p>	<p>It seems another missed opportunity not include expectations re high sustainability standards for housing in this section, as a means of embedding sustainability objectives more consistently across the Plan.</p>
<p>Policy SI2: Minimising greenhouse gas emissions</p> <p>A</p>	<p>Many of our comments above are focused on integrating ambitions for high quality, low impact, low emissions housing and development more fully into London’s view of good growth and across the Plan. However, a focus on the specifics of what London is trying to achieve on emissions and efficiency is of course necessary and our comments on those aspects are below.</p> <p>Clarify inclusion of non-residential by including the words <i>“Major residential and non-residential development....”</i></p> <p>The energy hierarchy is a useful guide for developers. But performance once in use is also a critical issue for London development with significant impacts on the emissions that new development actually generates, as the draft Environment Strategy highlighted (proposal 6.1.4b). Therefore, in agreement with LETI’s proposals, we would support the addition of a fourth level in the hierarchy:</p> <p><i>“4) Be seen: monitor, verify and report on energy performance in use.”</i></p> <p>Including that in the hierarchy would be a natural follow on from better reflecting sustainability expectations in the Plan’s design policies, as it will prompt developers to consider approaches that can design in low emissions and guarantee energy performance once in use, such as a Passiv standard, or the use of a smart thermostat by Ashden award winner Switchee to monitor energy in use.</p>

<p>C</p> <p>9.2.1</p> <p>9.2.2.</p>	<p>Policy SI2 C leaves room for doubt and failure to meet the target. For clarity and strength of expectation it should read: <i>“In meeting the zero-carbon target a minimum on-site reduction of at least 35 per cent beyond Building Regulations 117 is expected. Residential development should aim to achieve a minimum of 10 per cent, and non-residential development should aim to achieve a minimum of 15 per cent through energy efficiency measures.”</i></p> <p>9.2.1 text: we strongly support major refurbishments being required to meet the zero carbon target as well. Many large developments in London will be officially classed as refurbishment and it is a missed opportunity not to require an uplift in energy efficiency while refurbishment is being carried out. To that end, the final sentence of this paragraph should read: <i>“Development involving major refurbishment should also aim to meet this policy.”</i></p> <p>Ashden winner Parity Projects has valuable experience in overcoming retrofit challenges and wide knowledge of the approaches available, which can be shared to support developers, including their market leading CHROM stock assessment tool. PassivHaus Trust can also advise on a passiv retrofit standard, which London could consider advocating. It is appropriate at scale, particularly in whole block retrofits of flats.</p> <p>9.2.2. text: we strongly agree that the energy hierarchy should inform the design, construction and operation of new buildings. But the draft Plan misses opportunities to ensure that happens. References to emissions and energy should be integrated in to the design policies (see notes above) and the inclusion of a monitoring level to the energy hierarchy will help to ensure that the operation of buildings continue to be low emission.</p>
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<p>9.2.4</p> <p>9.2.7 – 9.2.8</p> <p>9.2.10</p>	<p>9.2.4 text: we strongly support the application of the zero carbon target to non-residential development. This will be an important leadership role for London.</p> <p>9.2.7 and 9.2.8 text: the text could be stronger in making it clear that offsetting should be a last resort, as developers in high numbers are stating that carbon abatement measures are not technically feasible or not cost effective.</p> <p>We also encourage the Mayor to be more directive to all Boroughs about the use of their offset funds, rather than simply providing guidance. This would help create consistency in how offset funds are spend and to ensure that they are being spent strategically to support retrofit.</p> <p>9.2.10 text: additional guidance from the Mayor on sustainable design and construction would be welcome. Better integrating sustainability expectations into the Design policies in the London Plan would also help to achieve this.</p>
<p>Policy SI3: Energy infrastructure B</p> <p>C</p>	<p>Policy SI3 B: We strongly support the development of energy masterplans for large-scale development locations. But the guidance included in section B of this policy at present is very focused on heat.</p> <p>Energy masterplans should be required to look at all decentralised energy options including renewables generation, demand response and passiv design options.</p> <p>Policy SI3 C: Where developers find that infrastructure cannot accommodate proposed new generation, they should be required to examine demand response and flexible grid management solutions, such as those provided by Ashden winners Open Energi and Smarter Grid Solutions, so that</p>

	<p>infrastructure limitations do not prevent low carbon energy infrastructure being installed.</p>
<p>Policy SI4: Managing heat risk A</p> <p>B 4)</p>	<p>Policy SI4 A: we support the recognition that overheating can be managed through good design in the first place and highlight this as another example of how sustainable outcomes should be embedded in the design policies of the London Plan.</p> <p>Policy SI4 B 4: Ashden winner Monodraught has highlighted limitations on their ability to promote passive ventilation/cooling in commercial premises. Current guidance on commercial spaces, for example, from the British Council for Offices (BCO) prevents them being an energy saving alternative to air conditioning in commercial buildings.</p> <p>BCO guidance details an internal condition for mechanical air conditioning of 24°C + or – 2°C, which restricts alternatives to conventional mechanical air conditioning being utilised. In contrast, the Chartered Institute of Building Services (CIBSE) guidance for naturally ventilated buildings looks at an adaptive thermal comfort level which is more flexible. It allows for an increased level of indoor temperature by balancing it against the overall impacts of the seasonal increase in temperature, such as the fact that building occupants will be dressing appropriately for the season, which makes excessive cooling potentially uncomfortable.</p> <p>If an adaptive temperature profile was adopted and promoted in the London Plan or in London engagement with the commercial sector, it will create a stronger market for passive cooling options and greater energy saving potential could be realised.</p>

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