

# Ms Amber Fahey comments

Page: Draft New London Plan

Section: N/A

1. 'Operational Zero Carbon' by 2030 for all new buildings - this moves beyond the current definition of a 'design prediction' using a 'percentage CO2 reduction', to deliver actual operational and measured zero carbon buildings.
2. An absolute kWh metric – to allow the full range of stakeholders involved in the design, operation and delivery of our buildings to understand and therefore fully contribute to reducing energy consumption. ?
3. Adding a 'Be Seen' stage to the energy hierarchy - we fully support the inclusion of energy monitoring, this is seen as fundamental to achieving operational zero emissions and thus should be elevated into policy SI 2A. ?
4. Energy strategies to demonstrate future-proofing to 'Operational Zero Carbon' on-site by 2030 – we support clause 9.2.10i of the draft London Plan, but believe leaving it until 2050 will only encourage further lock-in to fossil fuel and urban combustion pollution. ?
5. Addressing whole life embodied carbon to be explicitly included in Policy SI 2 – to drive innovation addressing what will become the largest building carbon emissions challenge once operational carbon is reduced. Policy SI2 should require assessment of embodied carbon in both new developments and in refurbishment schemes and provide a target for reducing embodied carbon emissions.?
6. A zero emissions by 2030 transition plan to be provided for all district heat/energy networks, alongside disclosing energy usage and efficiency data to ensure that networks are part of the solution to delivering operational zero emissions. ?
7. The heating hierarchy to be renamed and rearranged to emphasis the changing priorities of a trajectory to a zero carbon London. ?
8. The importance of minimising energy demand peaks to be strengthened.
9. 'Mayor's Energy Advocates' to be available for boroughs to assist in ensuring sustainable design is embedded, as a parallel to the Mayor's Design Advocates.

### **Policy H1 Increasing housing supply**

1. We feel that the overall housing target, derived from the Strategic Housing Land Availability Assessment (SHLAA) can only be achieved through - over-delivery of one and two-bedroom homes, failure to address high levels of overcrowding prevalent in some of the most deprived communities of London and failure to deliver mixed and balanced communities and lifetime neighbourhoods.
2. We don't feel that this can be defined as 'good' or sustainable growth particularly where there are huge questions around financing for essential social infrastructure and homes that households with below median income levels can afford.
3. Having a single target for all types of homes needed in London gives the impression that delivery of homes, regardless of type and tenures is essential and is meeting need while often is it only meeting need at the top end.
4. Successive London Mayors have argued that delivering of more market homes (than evidence suggests is required) is the best way to bring down house prices. However, an increasing range of media commentators say that building more homes (regardless of type) will not deal with the housing crisis and won't bring down house prices.

The Kate Barker national review of housing supply of 2004 recognised this, saying that even if private housebuilding roughly doubled from 120,000 to 240,000, house prices would still continue to rise on a trend of 1.1 per cent above inflation. The review said that to stop house prices rising at all would imply a level of market housebuilding that would be “undesirable and unachievable”[1].

1. The evidence of need for social-rented homes in London is enormous. The SHMA identifies this at 47%, but taking 25 years to meet the backlog of need. If the very high levels of backlog of need for social rented homes (at 163,000) was to be met over a 10-year period this would require 62% or more of homes delivered to be social rented.

2. We proposed that policy H1:

- title be changed to ‘**increasing supply of the range of homes needed in London**’;
- should provide targets for the different tenures of homes required over a 10-year period setting out need as identified in the SHMA (but with alterations we suggest in Policy H12) along with an overall total;
- require a cap on delivery of homes above targets, except in the case of social / low-cost rented homes, where there is such a high backlog of need.

## **Policy H2 Small sites**

2.1 While some protection for exiting social-rented homes is provided in respect of larger scale estate regeneration and demolition (Policy H1o), we are worried that social housing estates will be targeted for small scale demolition and development through this policy, resulting in on going loss of precious social-rented homes, green and play spaces. Section B(1) is of concern in this respect.

1. We support the inclusion in Policy H2A(4) – providing support for custom, self-build and community-led housing, but feel that the policy should be strengthened.

2. We propose the following:

- Policy H2 should more actively encourage custom, self-build and community-led housing – particularly where it meets social / low cost rented need;
- it should require boroughs to establish relationships / work closely with local custom, self-build and community-led housing organisations to delivery social / low cost rented homes; Leathermarket JMB being a good example of this;
- design codes should not be determined on clear measurable standards;
- the following text (in bold should be added to section F7 - **social housing estates, including** estate regeneration schemes, unless full consultation has been carried out and full agreement attained in line with the Mayor’s good practice guide on estate regeneration.

[1] [http://webarchive.nationalarchives.gov.uk/20120704150620/http://www.hm-treasury.gov.uk/d/barker\\_review\\_report\\_494.pdf](http://webarchive.nationalarchives.gov.uk/20120704150620/http://www.hm-treasury.gov.uk/d/barker_review_report_494.pdf)

Page: [Policy S1 Developing London's social infrastructure](#)

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### **Policy S1 Developing London’s Social Infrastructure**

Our greatest concern about this policy is the availability or lack of availability of funding to support the needs for new social infrastructure. At present in many areas of large scale development there is a play off between the need for ‘affordable’ housing and that for social infrastructure when both are needed to facilitate the development of sustainable communities and Lifetime Neighbourhoods. Insufficient funding leaves a question around whether the London Plan will deliver sustainable development.

We propose the following alterations:

- **'Financially accessible to all section of communities'** should be added to section C after – 'Development proposals that provide high quality'.
- **'Including that managed by voluntary or community sector groups'** should be added after 'social infrastructure' in S1G.

Page: [Policy E8 Sector growth opportunities and clusters](#)

Section: [N/A](#)

We are concerned that much of this policy is aimed at 'people like us' (i.e. those developing the policy) rather than seriously considering how policy may address the issues highlighted in the text of E11 – particularly for exiting lower income households that are unemployed or are in in-work poverty and young people.

Page: [Policy E9 Retail, markets and hot food takeaways](#)

Section: [N/A](#)

Much of this kind of over-development of global retail stores creates sameness – not vitality and diversity. It damages local markets, such as Sheppard's Bush market, which meet the needs of less well-off local communities. The markets referred to in this policy and supporting text are either more expensive specialist markets or are aimed principally at tourists rather than local low-income communities.

Page: [Policy G4 Local green and open space](#)

Section: [N/A](#)

We propose that G4 should include '**green space on housing estates should be protected and enhanced**'. A fair number are though also open to the general public. They form precious play, relaxation and gardening spaces for many low-income households that might struggle financially to access larger areas of green space outside their immediate areas.

Page: [Policy SI2 Minimising greenhouse gas emissions](#)

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A

All new buildings should be zero carbon emissions?in operation by 2030.?This differs from the GLA definition of net zero carbon.

Proposed wording:

*A. Major development should have zero carbon emissions in operation by 2030. This means reducing carbon dioxide emissions from construction and operation, and minimising both annual and peak energy demand in accordance with the following energy hierarchy*

A

Move monitoring into the energy hierarchy and re-phrase to include the word "verify".

Proposed wording:

*A. Major development... in accordance with the following energy hierarchy:*

- 1) Be lean...*
- 2) Be clean...*
- 3) Be green...*
- 4) Be seen: monitor, verify and report on energy performance in use.*

**B**

Remove “will be expected to”, to prevent?ambiguity.

Proposed wording:

*B. Major development should include a detailed energy strategy to demonstrate: how the zero-carbon target will be met within the framework of the energy hierarchy; and [text removed] to monitor and report on energy performance.*

**C**

Remove “in meeting the zero carbon target”. This over-represents the impact a 35% reduction beyond Building Regulations would have on achieving zero carbon.

Remove “aim to” and introduce “a minimum of” to provide a clear level of performance.

Proposed wording:

C. [text removed] A minimum on-site reduction of at least 35 per cent beyond Building Regulations is expected. Residential development should [text removed] achieve a minimum of 10 per cent, and non-residential development should [text removed] achieve a minimum of 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided:

1) through a cash in lieu...

2) off-site... ”

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8. The importance of minimising energy demand peaks to be strengthened.

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E

Additionally the below should be added into SI 2

*E. Referable schemes should undertake a nationally recognised life cycle carbon assessment.*

Swap the word "demand" for "consumption".

Include clarification on monitoring and reporting techniques in the SPG.

Proposed wording:

- 1. The move towards zero-carbon development requires comprehensive monitoring of energy consumption and carbon emissions to ensure that planning commitments are being delivered. Major developments are required to monitor and report on energy performance [text removed] to the Mayor for at least five years via an online portal to enable the GLA to identify good practice and report on the operational performance of new development in London.*

i)

i) Alter wording to include a 2030 zero carbon requirement.

Proposed wording:

*i. Proposals explaining how the site has been future-proofed to achieve zero-carbon on-site emissions in operation by 2030.*

g)

g. Reword text to encourage variety and innovation in applications.

LETI strongly feel the word 'response' should be replaced with the word 'management'

Proposed wording:

*g. To anticipate infrastructure capacity challenges for a growing London, submit proposals for energy demand management and reductions in peak energy demand.*

h)

h. Remove "proposals for" and ask design teams to "demonstrate".

Swap the word "demand" for "consumption".

Add the words "monthly and reported" for clarification.

Proposed wording:

*h. Demonstrate how energy consumption and carbon emissions post-construction will be monitored monthly and reported annually (for at least five years).*

k)

k. Strengthen wording to take into account the whole life-cycle of materials as well as the initial embodied carbon.

Consider bringing life cycle carbon into policy through the addition of a clause in policy SI2.

Proposed wording:

*k. Report on embodied carbon and provide proposals to minimise whole life cycle carbon.*

D

Swap clauses a. and b. and re-phrase to include energy sharing and efficiency measures.

Merge clauses c. and d.

Merge clauses e. and f. and re-phrase.

Proposed wording:

*D. Major development proposals within Heat Network Priority Areas should have a communal heating system.*

*1) the heat source for the communal heating system should be selected in accordance with the following low carbon heating hierarchy:*

- 1. connect to an energy sharing network through the capturing and using of waste heat and/or use of available local secondary heat sources. ?*
- 2. connect to a local existing or planned heat network where it is demonstrated to be running efficiently, the cost of heat to occupants is comparable to national average heating fuel costs, and there is a zero emissions transition plan in place to ensure that the development achieves zero carbon emissions in operation (if it is not already fossil fuel free). ?*
- 3. generate clean heat and/or power from zero-emission sources (examples include: solar technologies, heat pumps and energy storage powered by renewables). ?*

*use low emission combined heat and power (CHP) (where suitable for size and demand of development)? or ultra-low NOx gas boilers (in areas where legal air quality limits are exceeded all development proposals must provide evidence to show that any emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler). If the development uses fossil fuels then a zero emissions transition plan must be in place to ensure that the development achieves zero carbon emissions in operation by 2030. ?*

Page: [Policy SI3 Energy Infrastructure](#)

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Our greatest concern is the relationship between energy infrastructure, fuel costs and fuel poverty. There are issues around the viability of a decentralised energy network unless a critical mass of users and a range of different users are linked in in order to achieve scale, economy and balance demand and production. We are concerned that the decision to prioritise heat networks has not been grounded in an evidence based comparison with other ways of reducing greenhouse gases, particularly since new homes will be well insulated and will not require so much heat

We are also concerned about the lack of any written-in protections for heat network residents, in terms of reliability, service, or costs. There are lock-in cost implications to the consumer of a single commercial provider in any one area; essentially a monopoly, and presently an unregulated one.

We feel this policy should require that

1. a full assessment is made in each case of costs of different alternative energy supply options, dependent on number of users and energy performance to assess whether CHP and District Networks have the potential to be the best options in terms of costs for low income households and in terms of the climate and local environmental (air quality);
2. there be full consideration of renewable energy options including community owned energy projects and of community owned heat networks;
3. residents should be fully consulted on heating options in both refurbished and regenerated schemes, and buyers should be fully informed about what they are buying into.

4. there should be ongoing monitoring of new schemes to ensure that what they say will be achieved is actually delivered, with information made available to residents in understandable form, and with punitive sanctions when commitments / contracts are breached, with compensation going to the end user.