

Miss sabrina friedl 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.

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 emphasise 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

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

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.
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

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

Section: [SI2](#)

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

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... ”

E
Additionally the below should be added into SI 2
E. Referable schemes should undertake a nationally recognised life cycle carbon assessment.

Page: [Policy SI2 Minimising greenhouse gas emissions](#)
Section: [9.2.8](#)

Swap the word “demand” for “consumption”.

Include clarification on monitoring and reporting techniques in the SPG.

Proposed wording:

a) 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.

Page: [Policy SI2 Minimising greenhouse gas emissions](#)
Section: [9.2.10](#)

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) Reword text to encourage variety and innovation in applications.

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