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Dear London Plan

We have the following comments on the Draft New London Plan.

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Chapter 1 Planning London's Future (Good Growth Policies)

We support the principles set out in the Introduction, that 'growth' should not be supported at any cost, and that London should not be overly dependent on one economic driver (financial services) to deliver greater prosperity. We support the principles that economic development should be inextricably linked to creating a greener, healthier and safer city, maintaining and extending diversity, and reducing inequalities. We urge that these principles are constantly kept in mind throughout all planning and implementation processes, and that robust measures are put in place to ensure they remain central to them.

GG 2 Making the best use of land

In general, we support the policy of creating high-density, mixed-use places: intensifying the use of land while utilizing existing assets and protecting and extending London's greens spaces, including the Green Belt, Metropolitan Open Land and conservation areas. However we also note the following concerns:

- prioritising as 'Opportunity Areas' small sites and those on the edge of town centres with existing communities transport links may help cut commuting and fit into the larger strategy of encouraging walking and cycling. However, it will not necessarily help the regeneration of poorer and more marginalised areas. It may also lead to longer commutes as employment opportunities may not tally with the skills of those actually living in a specific area.
- intensifying land use could result in over-occupation and overcrowding of various kinds and there needs to be stringent safeguards (see the chapter on Design) against both inappropriate small-scale housing and other developments.
- prioritising brownfield sites for development needs to be done sensitively, as many of these sites are important spaces for various kinds of wildlife. Developing these areas needs to be balanced by the extension of existing, or development of new, wildlife conservation areas, and other green spaces.

GG3 Creating a healthy city

We strongly support all the key points in this section, in particular, using the Healthy Streets Approach to prioritise health in all planning decisions, and the use of Health Impact Assessments to safeguard the health and wellbeing of Londoners in all planning decisions.

We support point F – that all new buildings are well-insulated and ventilated to avoid health problems associated with damp, heat and cold. However these measures could be more explicitly linked to those ensuring the wider reduction of the carbon footprint of all new buildings, and this in turn needs to be presented as inextricably linked to the health and wellbeing of Londoners.

GG6 Increasing efficiency and resilience

We strongly support these measures, in particular: improving energy efficiency and the move to a low carbon circular economy; and ensuring building and infrastructure are designed to adapt to a change climate. They could be more clearly integrated and signalled within the section on Housing. There could also be more on waste and recycling in this section.

Chapter 2 Spatial Development Patterns

Notes on Chapter 2

We welcome the emphasis in this chapter on the provision of more housing and more jobs to meet the needs of London's expanding population but are concerned about the impact of this enormous amount of development on the capital's green and open spaces, on its vibrant cultural life, its transport links and on the overall quality of life.

Introduction

Para 2.02 We agree with the statement in that London's green and open spaces and its parks and rivers are a vital part of the capital. It is very important that the Green Belt and Metropolitan Open Land designations are reinforced and protected.

2.07 We welcome the emphasis on sustainable and inclusive regeneration which benefits local communities and where new employment and genuinely affordable housing are properly integrated into development.

Policy SD1 Opportunity Areas

A 6 We agree that Opportunity Areas should tackle spatial inequalities and environmental, economic and social barriers but consider that provision of new open space including small local 'pocket' parks should be an integral part because of the marked effect this can have on the quality of life in regeneration areas.

Para 2.1.10 and 2.1.11 We support the Mayor's Transport Strategy where this ensures that that new dedicated public transport and walking and cycling provision are central to Opportunity Areas, and the bringing forward of new priority transport infrastructure schemes. Improving ease of accessibility and connectivity will be central to the success of new housing and employment provision in Opportunity Areas.

Crossrail 2 North

Lea Valley OA Development in this Opportunity Area is crucially dependent on the transport improvements that Crossrail 2 will bring. The priorities here for the Planning Framework are supporting the development of the clusters of creative industries in Tottenham and Walthamstow and improving access to the Lee Valley Regional Park and the reservoirs.

Wood Green/Haringey Heartlands OA Again the routing of Crossrail 2 through Wood Green, if this is confirmed, will bring improvements in accessibility which will enable more employment and housing units to be supported when combined with the publicly-owned land holdings around Wood Green High Rd. However it is essential that new developments include a substantial proportion of genuinely affordable housing units and are not simply oriented at

investors including foreign-based ones. Any new cultural areas should be integrated with new parks and open spaces which provide a sustainable resource for new communities.

Elizabeth Line West and East

We welcome the progress made with the development of the Elizabeth Line (Crossrail) since this will enormously improve connections from Heathrow and Central London to the East End and beyond to the benefit of all Londoners and opens up a number of Opportunity Areas for jobs and housing. Again it will be very important to ensure that a large proportion of the new housing developed is genuinely affordable so that the needs of lower-income Londoners are met.

Policy SD4 The Central Activities Zone

The Central Activities Zone has a unique role in providing many jobs for residents of Inner and Outer London with its concentration of arts, cultural and entertainment industries and its specialist clusters relating to government, law, health, education and other functions. We support steps to support its viability and to improve the often poor quality of its air.

Policy SD6 Town Centres

We welcome the promotion of the vitality and viability of London's town centres and support their enhancement and strengthening for a wide range of activities such as employment, business space, shopping culture and social infrastructure. We particularly support para H and want see more emphasis on a highly accessible and inclusive town centre environment which provides well-designed crossing points, dropped kerbs, seating and public toilets as well as cycle lanes and cycle parking.

Chapter 3 Design

Policy D1 London's form and characteristics

We welcome the area-based strategies and development proposals with the emphasis on: optimising density, being street based, using green and open spaces with pedestrian and cycles facilities and highlighting the importance of waste management.

Policy D2 Delivering good design

We agree with the aim to identify an area's capacity for growth, the most efficient use of land, design quality, taking into account existing character and context and to engage Londoners in the planning process.

Policy D3 Inclusive design

We support the move to the highest standards of accessibility and safe pedestrian routes linking communities.

Policy D4 Housing quality and standards

We welcome the emphasis on private outdoor space and recycling proposals, however more work is needed on insulation, sustainable heating and ventilation.

Policy D5 Accessible housing

We support these proposals.

Policy D6 Optimising housing density

The emphasis here is the most efficient use of land, using different measures concerning optimum density, the requirement for good design and we support the taking into account existing and future public transport

services. Public transport needs to be in place before development to reassure prospective residents that they do not need a car.

Policy D6 needs to be amended to avoid a lack of associated public infrastructure, and excessive housing densities and 'town cramming'.. Proposed changes: The phrase 'in exceptional circumstances' should be deleted from the last sentence in Policy D6B 3) so that it reads 'This may mean that development is contingent on the provision of necessary infrastructure and public transport services...'. The density levels specified in Policy D6C should be amended to 80, 170 and 260 units per hectare respectively so that it reads: ' 1) 80 units per hectare in areas of PTAL 0-1; or 2) 170 units per hectare in areas of PTAL 2 to 3; or 3) 260 units per hectare in areas of PTAL 4 to 6'.

Policy D7 Public realm

We agree that the priority should be on connected routes, spaces management and preventing excessive street parking.

Policy D8 Tall buildings

We support sustainable development in appropriate locations and that safety considerations must be central to the design.

Policy D9 Basement development

There should be a presumption against basement development. The policy supports smaller-scale basement excavations, where appropriately designed but restricting large-scale basement excavations. We would propose there should be much greater scrutiny.

Policy D12 Agent of Change

We propose this policy needs greater explanation in particular to noise-generating uses in residential settings.

Policy D13 Noise

We support these proposals but additions should be made to this policy as follows:

Para B: Boroughs [etc] should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra's Noise Action Plan for Agglomerations and ensure local green space is improved in line with Policy G4 (as amended) including by:

1. taking action to reduce traffic noise around parks which are severely impacted by traffic noise and pollution,
2. using such measures as temporary/weekend street closures and/or permanent re-routing of traffic; or
3. introducing natural or man-made noise barriers.

Chapter 4 Housing

H1 Increasing housing supply

B 1 We recognise the advantage of treating London as a single housing market as a means of ensuring an increased supply of housing, and that targets should be met in Councils' Development Plans. However this policy does have implications for local democracy and the role of local consultation must be protected. There must be safeguards to ensure that local residents' views are taken in to account in all planning decisions.

B 2 We support the development for housing of some brownfield sites, including the redevelopment of car parks and retail parks. However as stated above, the wholesale development of all apparently underused brownfield sites might have serious environmental implications, particularly on local flora and fauna, which often thrive on such sites.

H2 Small sites

A In general we support the development of small sites, particularly encouraging the development of community-led housing, including co-housing projects.

D and E The proposal to 'increase the density of existing residential homes within PTALs 3-6 or within 800 of a Tube station' needs to be done extremely sensitively. In areas where there is no Design Code, the onus placed on residents to demonstrate that harm would result to residential privacy, heritage assets or local biodiversity 'that outweighs the benefits of additional housing provision' potentially places these assets under threat. From an environmental perspective, the implications for biodiversity are particularly concerning.

H 4 Meanwhile use

We support the use of precision-manufactured homes to provide housing on sites waiting longer-term development, provided they meet rigorous environmental standards.

H 5 Delivering affordable housing and H6 Theshold approach to applications

We strongly support the delivery of a higher proportion of affordable housing, and agree that this should mean *genuinely* affordable, not as currently, up to 80% of market rent. We consider that the proposed initial threshold for affordable housing should be 45% not 35%, and that it should be reviewed with a view to increasing this to 55% in 2021. The overall aim that 50% of all new homes to be affordable across London should also be increased to 55%.

H 10 Redevelopment of existing housing and estate regeneration

We agree that where there is loss of existing housing it should be replaced by better quality housing of the same or greater density, at rents that are the same as what has been lost, and if possible, a greater proportion of affordable housing floorspace. The redevelopment of specific areas should not result in an increase in rent and all tenants should be able to return on the same or better terms than their existing ones.

H 11 Ensuring the best use of stock

We strongly support taking all possible measures to take empty and 'buy to leave' properties back into use, and that Boroughs should take all measures at their disposal, including Empty Dwelling Management Orders, to bring vacant stock back into use as affordable housing.

H12 Housing size mix

A We agree with most of the proposals, in particular the requirement to deliver mixed and inclusive neighbourhoods, and the use of new development to reduce pressure on conversion and sub-division of existing stock. However the implication in 9 (the role of one and 2 bed units to free up family housing) that older residents will wish to downsize, is problematic and should not be regarded as a reliable indicator when assessing the unit mix of a new build development.

H 13 Build to rent, H14 Supported and assisted accommodation, H15 Older persons housing,

We support these proposals, with the proviso that the standards identified in Chapters 2 on Design and 9 on Infrastructure are rigorously met.

H17 Purpose-built student accommodation

We support the proposals that these developments should be planned as part of a diverse and inclusive neighbourhood, that accommodation is secured for occupation of students of specific institutions, and that they should be in areas well connected and suitable for walking, cycling and public transport but away from existing

concentrations in central London. However we think that the proportion of affordable accommodation should be a minimum of 60% not 35%.

Chapter 6 Economy

Policy E2 Low-Cost Business Space

We support para B which provides for the re-provision of lower-cost B1 space (including creative and artist studio space in development proposals for areas where there is an identified shortage of such space. There are particular pressures on such space in many parts of London but smaller occupiers and creative businesses, essential to the functioning of many urban districts, are sensitive to price rises.

Chapter 8 Green Infrastructure & Natural Environment

Policy G1

We welcome Policy G1 and have no proposed amendments.

Policy G2

We welcome Policy G2 and particularly the proposal in Policy G2B that 'de-designation' of Green Belt will not be supported. This policy needs to be reinforced for it to be effective. Proposed change: A presumption against the alteration of Green Belt boundaries which reduce its extent should be included in policy G2B so that it reads: 'The extension of the Green Belt will be supported and its de-designation will not be supported. We will enforce a presumption against the loss of Green Belt'.

Policy G3

We welcome recognition that Metropolitan Open Land (MOL) should be protected from inappropriate development but this policy is undermined by Policy G3 C and the provision to allow 'land swaps' because MOL is characterised by its 'permanence'. Proposed changes: Policy G3 C should be deleted along with the sentence in paragraph 8.3.2 "The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy". Policy G3B should be amended to read: 'The extension of MOL designations should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.'

Policy G4

We are concerned that Policy G4 contains insufficient recognition of the contribution of private gardens to the extent of green space. A policy is needed to prevent extensive 'garden grabbing'. Proposed change: Policy G4 A should be revised to include reference to private gardens to read: 'Local green and open spaces, including public and private gardens, should be protected'.

We welcome support for the creation of new areas of accessible green and open space. These provisions should be strengthened by requiring measures in Policy G4 to improve the quality of green space. Proposed changes:

Policy G4 C – should read "Assessments should identify areas of public green and open space deficiency, including an assessment of deficiency in quality, taking account of Green Flag criteria, noise and air pollution, and using the categorisation set out in Table 8.1 as a benchmark for all the different types required."

Policy G4 E 1) should include at the end 'including an assessment of, and where appropriate a plan, to improve the quality of the space'.

The policy on noise should make explicit reference to the need to reduce the impacts of noise on green space, and other relevant policies amended accordingly. Proposed change: Additions should be made to Policy D13 Noise as follows:

Para B: Boroughs [etc] should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra's Noise Action Plan for Agglomerations and ensure local green space is improved in line with Policy G4 (as amended) including by:

1. taking action to reduce traffic noise around parks which are severely impacted by traffic noise and pollution,
2. using such measures as temporary/weekend street closures and/or permanent re-routing of traffic; or
3. introducing natural or man-made noise barriers.

The provision and improvement of green space requires funding to help deliver the Mayor's aspirations for 'good growth' and increasing London's green cover and should be addressed in Policy DF1. Proposed change: Policy DF1 D (2) should be amended to read as follows: 'Recognise the importance of affordable workspace and culture and leisure facilities, including public green and open space, in delivering good growth.'

Policy G5

The 'Urban Greening Factor' outlined in Policy G5 does not address the human use of green space and overlooks qualitative considerations and a wealth of knowledge about how people use green spaces and how design can enhance their experience. Proposed change: Policy G5 – a further sub-section should be added as follows: (C) Urban greening required and delivered in new developments will be additional to requirements to provide adequate green and open space as set out in G4. New developments must allow for provision of new green and open space in addition to meeting urban greening requirements.

Policy G6

The approach to biodiversity and access to nature outlined in Policy G6 needs to be strengthened to avoid the loss of valuable habitats and wildlife. Proposed change: Policy G6 – The second sentence in sub-section A of this policy should be deleted, along with the whole of sub-section C. The following sentence should be added at the start of sub-section D 'All new development should seek to achieve a net gain in biodiversity.'

Policy G7

Mature trees are a vital part of London's green infrastructure and there should be strict controls over felling them in Policy G7, along with recognition of the importance of established hedgerows. Proposed changes:

The value of hedgerows should be recognised in subsection B 1) of Policy 7 by amending it to 'protect 'veteran' trees, mature hedgerows and ancient woodland...'. The first sentence of Policy G7(C) should be amended so it reads as follows: "Development proposals should ensure that existing trees of quality, mature trees and hedgerows, and trees of value in terms of delivering eco-system services such as water or air quality management, are retained.

Policy SD1

Policy SD1 on Opportunity Areas should require sufficient space for the amenities usually provided by parks, in particular playing fields and courts for open air sport. Proposed change: Policy SD1 B(3) should be amended to read 'plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary, and ensuring open and green space is planned to accommodate informal and formal outdoor sports.

Policy S5

A decline in the quality of use of sports facilities is often used as an excuse for allowing development of public open spaces which needs to be addressed in policy S5. Proposed change: S5 B(4) This should be amended to read: "ensure that there is no net loss of facilities. If there is evidence that ongoing or future demand for sports means facilities are under-used measures should be taken to ensure demand is

promoted through a local sports strategy or to repurpose the space for an outdoor sport for which there is demand.”

Policy T4

The plan seeks to further restrict car parking in new development and to reframe the link to PTAL. Allowing excessive car parking in Policy T4 is inconsistent with the main transport policies which seek to reduce car trips. Proposed changes:

1. The following amendments should be made to Policy T4(C) – ‘Where appropriate’ should be deleted and Policy T4(D) should be changed to read “..planning permission may will be contingent on the provision of necessary public transport and active travel infrastructure.”
2. Table 10.3 - The bottom four rows should be amended so that the maximum parking provision in a development in any area (whatever the PTAL) is 0.3 spaces per unit.
3. Paragraph 10.4.4 – the word ‘Ideally’ should be deleted and the sentence reworded as follows: “Ideally New development of all sizes, but in particular that which will give rise to significant numbers of new trips, should be located in places well-connected with public transport...”

Policy T6 H

Policy T6 H: should be amended to read “Boroughs wishing to adopt borough-wide or other area-based car-free policies will be supported. [Delete the outer London caveat sentences.] Minimum standards are not appropriate for residential or non-residential land uses in any part of London.”

Policy GG2

We welcome the overarching policy GG2 concerning making the best use of land. This should be strengthened by reference in policy H1 to making use of excessive or redundant road space.

Policy H1 B2d

Proposed change: Policy H1 B2d) should be amended to include reference to excessive or redundant road space and other car-related infrastructure so that it reads ‘the redevelopment of surplus utilities and public sector owned sites, including excessive or redundant road space.’

Policies D1 to D6

We broadly welcome policies D1 to D6 in the draft London Plan which seek to improve the design and land use efficiency of new housing. We believe policy D6 concerning the optimisation of housing density needs to be amended to avoid a lack of associated public infrastructure, and excessive housing densities and ‘town cramming’.. Proposed changes: The phrase ‘in exceptional circumstances’ should be deleted from the last sentence in Policy D6B 3) so that it reads ‘This may mean that development is contingent on the provision of necessary infrastructure and public transport services...’. The density levels specified in Policy D6C should be amended to 80, 170 and 260 units per hectare respectively so that it reads: ‘ 1) 80 units per hectare in areas of PTAL 0-1; or 2) 170 units per hectare in areas of PTAL 2 to 3; or 3) 260 units per hectare in areas of PTAL 4 to 6’.

Protecting London’s Diverse Local Character

The draft Plan gives insufficient consideration to the protection and enhancement of London’s diverse local character. Policies D1 and and HC1 need to be amended to ensure that greater attention is given to the character map of London, and community or neighbourhood plans, in planning and designing new development. Proposed changes: The first sentence of Policy D1 ‘London’s form and characteristics’ should be amended to make specific reference to neighbourhood and community plans so that it reads ‘Development Plans, area-based strategies, neighbourhood and community plans. and development

proposals should address the following:’ The phrase ‘reflect and enhance local character and distinctiveness’ should be added to the list after 1) in Policy D1A.

The first sentence of Policy HC1 ‘Heritage conservation and growth’ should be revised so that it reads: ‘Boroughs should, in consultation with Historic England, other relevant statutory organisations and local community and neighbourhood planning groups, develop evidence that demonstrates a clear understanding of London’s historic environment, local character and distinctiveness.’

Ch 9 Sustainable Infrastructure

SI1 Improving Air Quality

We support the principles of SI1 to ensure that new developments should not adversely affect air quality, either during construction, or for residents after they move in.

Additionally at A 4) During the construction phase there should be monitoring and spot inspections of the air quality at each construction site – independent, but paid for by the developer, with power to halt work when infringements are discovered to prevent localised exposure. And at 6) no statements that air quality cannot be achieved should be accepted until an air quality professional, independent but paid for by the developers has reported.

SI2 Minimising greenhouse gas emissions.

We support the work conducted by the London Energy Transformation Initiative (LETI) that is based on the experience and knowledge of top building professionals from London and across the world, and included in our submission where indicated.

We support the LETI recommendations (their changes in brown) to amend SI1 to:

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

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. [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 nonresidential 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. **Referable schemes should quantify whole life carbon through a nationally recognized Carbon Life Cycle Assessment (Carbon-LCA) & demonstrate actions taken to reduce lifecycle carbon informed by this analysis.**

With supporting text now:

9.2.9 to be: 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.

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

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

9.2.10 to be: i. Proposals explaining how the site has been futureproofed to achieve zero-carbon on-site emissions **in operation by 2030**.

9.2.10 k. **Proposals to demonstrate actions taken to minimise whole life cycle carbon**

Additionally LETI recommends:

- all new buildings should have zero carbon emissions in operation by 2030. The full meaning of zero carbon and a long term action plan will need to be formed to ensure this goal is achieved. This differs from the GLA net zero carbon definition. The SPG should contain clarity on a long term plan to achieve zero carbon emissions in operation.
- Provide a link to the most up-to-date carbon factors for consultants to use in energy reports alongside the dated Building Regulation Part L values.
- Request the use of an alternative kWh/m² metric for comparison of energy demand between developments. Seek to adopt a kWh/m² metric in future policy.
- Request the calculation of unregulated energy/CO₂. Building Regulation Part L and planning carbon targets currently ignore unregulated carbon.
- Request that applications consider: plant space; demand response readiness; energy storage; natural ventilation readiness; glazing tech/fabric upgrade readiness; design for low temperature systems including larger radiators, underfloor heating and use of heat pumps, etc.
- Quantitative demonstration of future proofing should be encouraged.

SPGs should include:

- A clear list of required figures for applicants to monitor, collect and submit. This should include frequency of data collection and submission.
- Proposals for energy monitoring of major new developments during the first five years of operation should measure the following, in order of priority:
 1. Base building energy use: regulated energy uses defined by Building Regulations. This correlates with the responsibilities of the developer, their designers, contractors and building managers.
 2. Whole building energy use: regulated and unregulated energy uses to capture the total carbon footprint relating to London's objective to become a zero carbon city.
 3. Energy used directly by each occupier in a multi-let non-domestic building: this is the difference between the whole building energy use and base building energy use; measuring it gives agency to non-domestic tenants to manage their contribution to the total carbon footprint. For domestic buildings this is dealt with as part of the base and whole building energy use.

- Examples of data collection methods for non-domestic buildings such as display energy certificates (DEC) and landlord energy ratings (LER). Note that DECs mask the activities of individual tenants in multi occupier buildings, so should be complemented by base building ratings and individual outputs from each tenant.
- Request data on efficiency and energy usage to be disclosed from heat networks specifically.
- Request the reporting of energy and carbon per person and per m2 .
- Refer to current Islington Council policy for examples of monitoring in practice.

LETI can provide detailed content for SPGs on the topics of Demand Management and Embodied Carbon. They suggest that the GLA provide a simple online tool and database to provide simplicity and consistency to Boroughs on lifecycle carbon – based on EN 15978 methodology.

As well as the LETI recommendations - sound building should not be demolished without submitting calculations showing CO₂ emissions for one scenario for the new development, including the demolition of the existing building, and a second scenario for refurbishment of the building. It will be in terms of Global Warming Potential (as specified in EN 15804) i.e. in 'kg CO₂ equivalent.' Where kg CO₂ equivalent is significantly higher for the demolition scenario the application should be refused, unless there are more significant advantages.

LETI also suggests that the GLA provides Energy Advocates to Boroughs to write their SPGs, similarly to the GLA Design Advocates, and that there should be more transparency and consistency on the collection and use of cash-in-lieu offset funds.

SI3 Energy Infrastructure

LETI suggests that D should be:

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:

- connect to an energy sharing network through the capturing and using of waste heat and/or use of available local secondary heat sources.**
- 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).**
- 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.**

LETI's suggestions for SPGs are:

- Promote efficient low or zero carbon solutions for each development size and type. This will change over the lifetime the technology is installed for. The inclusion of heat networks should not override all other decision making processes.
- Provide guidance on appropriateness of heat networks to new development that is outside heat network priority areas or has low heat demand. Guidance could suggest applicants skip to part c. of the heating hierarchy where applicable.
- Ask applicants to be clear on assumed local air quality impacts/ limits and estimate likely annual energy costs to see if they represent a risk in terms of fuel poverty.
- Request the disclosure of heat network carbon factors used for calculations and during the lifetime of the operation of the plant. This is essential to understand the assumptions made by applicants and whether they are realistic.
- Provide links to guidance on low temperature heat networks and energy sharing within and between developments.
- Where heat pumps are proposed by applicants, encourage a shift away from high global warming potential (GWP) refrigerant use.
- Where LETI's suggested policy wording (above) is adopted, include a definition of an 'energy sharing network' and the requirements of a 'zero emissions transition plan'.

And GLA actions:

Update the London Heat Maps to include current plant and in-use efficiency data on heat networks. • Create strategic plans with local authorities for heat network opportunity areas. This should not be left to developers to determine, there is a strategic role here.

- Lobby government to class heat network infrastructure as a nationally recognised utility.
- Provide support for local authorities to follow-up on zero emissions transition plans and ensure implementation.

Policy **S14 Managing Heat Risk**, **S15 Water Infrastructure** and **S16 Digital connectivity infrastructure** are supported.

S17 Reducing waste and supporting the circular economy

We support the aims of these policies.

S18 Waste capacity and waste self-sufficiency

We generally support these proposals, especially the zero waste export from London by 2026. Additionally we would require that every Borough adopts consistent recycling requirements for residents to avoid low recycling rates due to misunderstandings from London's frequently moving population.

C. Where new waste facilities are in the process of approval or construction they should be considered in light of the targets at 9.7.3. eg 65% recycling composting by 2030 and construction, demolition, excavation 95% recycling by 2020. If a planned waste facility is not designed to maximise recycling eg plastic extraction and for clean energy from waste and anaerobic opportunities then it should be redesigned before proceeding. Green gas maximisation should be designed in before any new capacity is built. See https://alansenergyblog.files.wordpress.com/2016/07/final-the-green-gas-book_96pp_v5.pdf for the way forward.

D. this should also apply to upgrading existing sites.

3) the target for carbon intensity of electricity produced should be better than 400g of CO₂ carbon intensity floor, especially by removing plastic from the feedstock and being set up to take all forms of suitable waste such as used frying oil, coffee, fatbergs etc.

9.87. To enable the regular reviews of capacity to be constructive new waste facilities should be based on a modular design, so that, as waste reduces, they are not oversized, risking incentive to reduce waste.

SI9 Safeguarded waste sites and **SI10 Aggregates** are supported.

SI11 Hydraulic fracturing (fracking) Not allowing this in London is supported

SI12 Flood risk management and SI13 Sustainable drainage

We support these policies, particularly the B 2) green roofs and C re impermeable paving on front gardens and driveways.

SI14 Waterways – strategic role

A policy should be added to always consider unculverting Londons underground streams where appropriate. Upstream misconnections of sewage should not be used as a reason to leave these assets hidden. Where such culverts contain sewage enforcement should be firm and effective.

SI15 Water transport

We support these policies, except the sections on moorings should specify that only low carbon fuel and electricity should be provided. Vessels docking with high air pollution should be banned. The same point applies at: **SI16 Waterways – use and enjoyment** and **SI17 Protecting London's waterways** at E. and 9.17.3.

Chapter 10 Transport

We welcome the Plan with its emphasis on sustainable growth, its determination to limit unsustainable forms of transport and its promotion of a healthy lifestyle.

Policy T1. Strategic approach to transport. We agree with the development proposals but would like to see a more ambitious target for the achievement of 80% of travel to be by foot, cycle or public transport by 2041.

Policy T2. Healthy Streets. We welcome the Healthy Streets Approach both to produce a healthy lifestyle and also to reduce the use of powered transport. We would add that streets should be devoid of unnecessary clutter in order to make walking more pleasant.

Policy T3. Transport capacity, connectivity and safeguarding. Development should be at sites where there is or can be created accessible public transport provision and adequate, safe and pleasant cycling and walking routes.

We favour the extension of ULEZ to the whole of Greater London at an early date. Policy should encourage the use of electric or other non-ICE powered vehicles but in the context of discouraging powered private transport of all kinds because, whilst reducing the emission of toxic fumes at the point of use they still involve the emission of greenhouse gases during manufacture and still create danger and congestion on the road.

We favour the development of a road pricing scheme in which the cost of journeys by car is immediately apparent. This should have the effect of reducing car journeys.

We oppose road schemes which have the effect of increasing capacity for private cars. This includes the Silvertown Tunnel scheme.

There should be specific mention of the need to improve air quality. This should also be the subject of an additional clause in policy GG3.

Policy T4. Assessing and mitigating transport impacts. We support this policy.

Policy T5. Cycling. Provision for cycle parking is one of the most serious impediments to increasing cycling rates. The proposed minimum standards should be increased particularly for residential parking and there should be effective enforcement provision.

Policy T6. Car parking. We agree with the establishment of car free developments wherever possible. Traders often think that the provision of car parking is important to their business but find when parking is restricted they benefit. Steps need to be taken to reassure traders when parking restrictions are proposed.

Policy T6.1. Residential parking. The standards for Outer London seem unnecessarily generous. It would be difficult to reconcile these standards with the aim to make 80% of journeys by non-powered means. The priority in areas with low PTAL standards should be to raise the standard rather than to allow more parking.

Policy T6.2. Office parking. The priority here should be to implement Workplace Parking Levy schemes.

Policy T6.3. Retail parking. The presumption should be not to provide parking for retail units and there should be restrictions on out of town retail parks.

Policy T6.4. Hotel and leisure uses parking. We agree with these proposals.

Policy T6.5. Non-residential disabled persons parking. We agree with these proposals.

Policy T7. Freight and servicing. We favour freight consolidation to reduce the number of freight vehicles in London. We favour the development of a 'London lorry' of a size more suitable to London streets than HGVs and with good all-round visibility by mirrors and/or cameras.

We favour the development of railheads to minimise the transport of freight on streets whilst bearing in mind the congestion which can be caused by siting railheads in heavily built up areas.

Freight distribution by electric vehicles and cargo bikes should be encouraged.

Policy T8. Aviation. We oppose the provision of more airport runway capacity in the south east.

Policy T9. Funding transport infrastructure through planning. Property owners benefit hugely from public transport development to such an extent that in some places they could finance the full cost and still come out with a profit. More robust mechanisms need to be put in place to extract this money.

Chapter 12 Monitoring

Suggested new KPIs:

1. Transport

KPI Transition to electric vehicles

Measure increased number of Londoners being aware of location of electric charging points and therefore prepared to consider purchasing an electric

2. Air Quality

KPI reducing exposure to air pollution

Measure increased number of Londoners being aware of ways to reduce their exposure including London T-charge, school exclusion zones, hybrid & electric buses

of Measure Spot checks on construction sites that show that, each year, there are fewer contraventions of Air Quality limits

3. Public Realm

KPI improving public realm

Measure number of new schemes that contribute to encouraging active travel and discourage travel by car by creating a sense of place and facilitating movement for pedestrians and cyclists

4. Green Infrastructure

KPI protection of Green Belt and Metropolitan Land – replace the one in the consultation with:

Measure loss of annual xx CO2 kg equivalent sequestration prevented, compared to expected loss of GB and MOP without the policy

5. Environment

KPI Carbon Emissions through new development - – replace the one in the consultation with:

Measure Annual CO2 kg equivalent reductions including unregulated carbon (based on the kWh metric recommended by LETI) compared to reductions expected under previous metric. (all new developments not just those referred).
building regulations

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