

(see full comment below)

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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.