

BWB Consulting comments

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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. 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.
5. The importance of minimising energy demand peaks to be strengthened.
6. '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.

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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.

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.

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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Swap the word “demand” for “consumption”.

Include clarification on monitoring and reporting techniques in the SPG.

Proposed wording:

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.

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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).