

Climate Integrated Solutions comments

Page: [Draft New London Plan](#)

Section: [N/A](#)

Definitions of major required. What is GLA referable?

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

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CIS welcome the move to zero carbon buildings as well as zero carbon homes.

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CIS welcomes the requirement for monitoring and reporting and are keen to hear more about these requirements.

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CIS are disappointed the on-site reduction target has not increased above 35%.

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CIS welcome the addition of Be Lean targets - however firmer wording would be preferable. It is understood that some building types (such as hotels) may struggle to meet these targets. We would therefore suggest building type specific targets which would ensure all buildings were striving for realistic targets which strive for push the industry in the right direction.

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Will Part L carbon factors be used? To implement others would cause confusion and more work.

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The terms under which off-site projects are acceptable should be clarified, i.e. guide lines of verification of carbon savings, delivery timescales and proof of additionality

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CIS welcome the inclusion of refurbishments within this policy however further guidance regarding demonstrating compliance is needed. Is this a reduction on Part L or compared to the existing?

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This is a positive inclusion and could be used to ensure maximum roof space is utilized by solar technologies.

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suggest the GLA need to provide guidance and comment on enforcement of schemes where the 35% on-site reduction target is missed, at present developers have been known to use the offset scheme to address shortfalls in on-site provision, this is compounded by the relatively low price of carbon at £60/tCO₂. guidance on penalty carbon prices and a significant increase in basic price of carbon are sought

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CIS welcomes the increased price/tonne however at £95 developers are still likely to look for minimum requirements on site (35%) as this cost is cheaper than on-site reductions.

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Further guidance regarding overheating would be welcome. What is an acceptable sample to model and what is an acceptable pass rate?

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CIS are keen to review further guidance regarding demand side response

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CIS are concerned that submitting data annually may result in a lot of the data including long running system errors. A more regular upload paired with an on-line portal capable of flagging issues to the design team could help to identify issues and ensure they are rectified.

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CIS are keen to review further guidance regarding future proofing

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CIS assume embodied carbon would be similar to BREEAM requirements and are keen to receive additional guidance regarding this.

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CIS are keen to review this guidance

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SI1 suggests that an air quality assessment will be required in most cases. This is therefore not putting additional work onto energy assessors or requiring comments outside of their area of expertise.

Page: [Policy SI3 Energy Infrastructure](#)

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CIS welcome the inclusion of the hierarchy under D and understand the need to move away from CHP.

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CIS would like to see the inclusion of heat pumps within this hierarchy. Although not zero carbon, due to improvements in grid electricity it is felt they should be considered.

in particular if heat pumps are paired with other on-site energy generation such as solar pv

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Section: [Figure 9.3](#)

CIS are pleased to see the updated to the London Heat Map.

Page: [Policy SI3 Energy Infrastructure](#)

Section: [9.3.4](#)

CIS welcome the detail regarding future proofing.

Page: [Policy SI5 Water infrastructure](#)

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CIS welcome the inclusion of water targets.

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Stronger wording would be preferable to ensure additional measures are assessed and considered.