Hilson Moran comments

Page: Policy SD4 The Central Activities Zone (CAZ)
Section: 2.4.16

Hilson Moran recommends that the current London climate change strategy is aligned with the latest CCC climate change risk analysis.This should then allow coordination of solutions across London and help inform Boroughs, in order to maintain a consistent approach. Hilson Moran receommend that risk easements be mandated for significant developments.

Page: Policy D10 Safety, security and resilience to emergency
Section: D10

Hilson Moran endorses policy aimed at ensuring and maintaining a safe and secure environment in London and have the following additional suggestions with respect to Policy D10:

- Para A: Boroughs may also need to consult Specialist Government Agencies / Sectors (e.g. CPNI, CAST) where sensitive, high risk and/or CNI related design is required;
- Para B: Development proposals should maximise building resilience and minimise all potential risks (not just physical).

Hilson Moran is concerned that Design Out Crime Officers and Counter-Terrorism Security Officers are few in number and there is a reliance on Security Design Consultants to deliver solutions and recommendations. There also needs to be a holistic risk management approach to design (for example, in line with the BRE SABRE methodology) to allow reasonable and appropriate recommendations for security measures rather than relying on generalist and inflexible solutions often proposed as part of 'Secured by Design.'

Page: Policy D10 Safety, security and resilience to emergency
Section: 3.10.3

Hilson Moran proposes that measures to design out crime also consider sustainable solutions and that development proposals should follow a holistic risk-management design framework and incorporate commensurate measures that are proportionate to the risk of a threat or criminal event, and reduce the impact of any likely consequences.

Page: Policy G5 Urban greening
Section: 8.5.3

HM endorses the level of protection for features of biodiversity value and importance in the New London Plan and the requirement for enhancement in the planning process to facilitate the recovery of species distributions and populations within the urban environment. Some clarity may be required in the application of the Urban Greening Factor, with queries likely to arise in the application of the methodology. The approach does, however, differ to that currently proposed by BREEAM (although currently under review), which may lead to uncertainties or confusion regarding biodiversity enhancement amongst developers.

Page: Policy SI2 Minimising greenhouse gas emissions

Section: 9.2.6

Hilson Moran endorses policy that prioritises carbon reduction through passive design and energy efficient design and specification. Notwithstanding, it is recommended that policy and supporting guidance provides further structure for circumstances where minimum energy efficiency targets are unfeasible due to, for example:

- Local noise and air quality constraints; or
- Shell only and shell and core speculative developments where backstop efficiencies have to be applied to building services in energy Building Regulations compliance assessments.

Page: Policy SI2 Minimising greenhouse gas emissions

Section: 9.2.6

Hilson Moran recommends that a unit size threshold be established in the New London Plan to account for small commercial units. The New London Plan should set out a recommended size threshold to Boroughs so that a consistent approach is established, as currently thresholds vary across Boroughs for small units.

Due to their frequently speculative nature and a requirement by the National Calculation Method for energy assessment to use backstop compliant system efficiencies, it is very challenging for retail units to demonstrate achievemnt of energy, carbon and BREEAM targets at planning stage.

Page: Policy SI2 Minimising greenhouse gas emissions
Section: 9.2.7

Hilson Moran endorses policy that requires the monitoring and public reporting of carbon offset funds across London Boroughs. Guidance on how carbon offset payments are calculated should be consistent and divergence from established methodologies, such as the NCM, should be justified by either party.

Page: Policy SI2 Minimising greenhouse gas emissions
Section: 9.2.9

Hilson Moran endorses the monitoring and reporting of energy consumption. However, it is largely recognised that planning commitments currently benchmark energy and carbon performance relative to the NCM, which does not enable modifications to expected operational profiles. For this reason, it is recommended that reporting of energy performance is related to industry benchmarks and or ranges established through recognised assessment procedures, such as CIBSE TM 54.

Page: Policy SI2 Minimising greenhouse gas emissions
Section: 9.2.10

Hilson Moran endorses the consideration of embodied carbon in energy strategies for Proposed Developments. Further clarity is required on how embodied carbon savings can be accounted for relative to the proposed New London Plan carbon targets.

In addition, a methodology for a standardised approach to embodied carbon accounting needs to be established, much like with the GLA guidance for energy strategies.

Page: Policy SI3 Energy Infrastructure

Section: SI3

Hilson Moran endorses the proposed increase in design flexibility for heating systems and infrastructure, and the prioritisation of air quality that runs through the London Environmental Strategy and New London Plan. However, it is recommended that policy also gives due regard to the environmental impact of the bi-products (in particular ammonia) of the selective non-catalytic reduction (SNCR) systems used to reduce NOx emissions.

With reference to the heating hierarchy, in particular the use of available local secondary heat sources in conjunction with heat pump), the National Calculation Method does not currently have a recognised methodology for calculating carbon emissions associated with neutral energy distribution systems. The final calculation method should standardise quantification of waste heat loss and should also account for the pump energy penalty, compared with higher grade energy district heating systems due to greater flow and return temperatures differential. Furthermore, the energy carbon factor or COP of systems rejecting heat to these neutral energy systems should account and benefit from this low grade waste heat recovery. Based on our research, neutral energy systems can be viable for heating only and for various development scales and should be promoted as they are more future proof from a strategic infrastructural percpective.

Hilson Moran endorses the introduction of energy storage on-site to meet current and future challenges in meeting required energy capacities and reinforcements. Notwthstanding, we recommend that Distribution Network Operators make data available to influence where energy storage is required and/or its quantum.

Page: Policy SI4 Managing heat risk

Section: 9.4.5

Hilson Moran endorses policy aimed at reducing the risk of occupant discomfort in residential and work environments. Nevertheless the following clarifications and additions are proposed:

- That the CIBSE TM 52 is required for adaptive thermal comfort strategies only (i.e. where natural ventilation is feasible)
- That an element of flexibility on TM 59 prescriptive parameters is permitted where external noise, air quality and/or security constraints are present, notwithstanding that variations are justified and environmental-health standards compliance is achieved; and
- That an element of flexibility on TM 59 prescriptive parameters is permitted where operational patterns are known or predictable.

Page: Policy SI5 Water infrastructure

Section: SI5

Hilson Moran endorses policy that requires developments to be water efficient. The proposed BREEAM Excellent performance level seems reasonable for most building types, but larger developments are likely to be able to improve on this minimum requirement and this should be encouraged. Policy should also encourage the viability for greywater to be evaluated for large developments.

Hilson Moran would encourage other certification methodologies to be referenced by the New London Plan.

Page: Policy SI8 Waste capacity and net waste self sufficiency
Section: 9.8.5

Renewable technologies that burn organic/biomass waste emit a large number of pollutants, namely particulate matter (in the form of PM10 and PM2.5), NOx, carbon monoxide, sulphur dioxide and more. This is more than those generally emitted from CHP/gas boilers.

Current guidance in the Mayor of London's SPG for Sustainable Design and Construction has less stringent emission limits for such technologies (although these are generally solid biomass). It is therefore suggested that the emissions limit for such engines is reviewed to ensure that Policy SI8, which already states that the impact on local amenity (AQ, dust, odour noise etc) should be considered, is enforceable to safeguard the health and wellbeing on of Londoners.

Page: Policy SI13 Sustainable drainage
Section: SI13

Hilson Moran endorses measures to reduce surface water run-off.

Impermeable surfaces: It should be confirmed that permeable paving can be specified for heavy load vehicle surfaces. Clarification is required as to whether this policy would indirectly reduce the areas required to be attenuated in a development. Currently only impermeable surfaces need to be accounted for, as it assumes that all other areas will infiltrate to some degree as natural systems. Clarificaton is required on how permeable surfaces in the vicinity of foundations are expected to be designed. Current guidance is for site infiltrating devices at a 5m offset from foundations.

Drainage hierarchy: The policy wording for the runoff rates makes no mention of the 50% minimum. This could lead to the weakening of the SuDS requirements, as currently the greenfield rate is an aspiration. Clarification is required as to what will be considered acceptable if greenfield rates cannot be achieved, as may be the case for some brownfield sites. It is recommended that policy requires SuDS attenuation to be maximised on site to reduce runoff rates to greenfield, unless significant restrictions to achieve greenfield rates exist onsite, which should be stated, or a minimum level of attenuation should be defined (such as the 50% minimum standard).

Page: Policy T6.1 Residential parking

Section: T6.1

We at Hilson Moran fully support the movement towards the use of cleaner energy in respect of transport. However we would express our concern in respect of the Mayor's plan for 20% of all allocated parking to include an "active" EV Charging provision with a "passive" provision for all remaining spaces. Our main concern is the definition of "passive" and TfL's definition that the Passive Spaces should be 'Infrastructure' ready.

The developer will need to make available 100% of the EV charging demand at Day 1. Given a DNO (e.g. UK Power Networks or SSE Networks) will have fully diversified load for large scale developments (5000+ Units) of circa 0.9kVA per unit and potentially an average of 1 parking bay per dwelling this effectively means that a developer would need to apply for triple the current electricity demand at Day 1. On smaller developments – and assuming that 'Load Management' through a single metered landlord supply cannot be provided - the electrical capacity that needs to be secured at Day 1 will be circa double the current demand. Irrespective of being able to introduce Load Management, there are a number of risks associated with such a policy;

- Whilst there is discussion in EV assisting the electricity distribution network by releasing stored energy back into the network at peak times and charging being controlled by ‘Smart’ metering and grids, we are still some way off of this being fully developed and we are currently within a period where network capacity is being asked to grow significantly with both EV and Heat Pump Technology being put forward for the residential markets, without the required capacity being necessarily available in the required locations (hence very expensive network reinforcement with very long lead times. With the transition away from combustion – even through district systems – heat pumps and EV charging simultaneously being required will significantly increase electrical demand at a time when Distribution Network Operators will only invest in natural growth not demand-led growth;
- Where EV charging is provided to individual residencies and not through a Management Company it is unlikely, in the near future, that these chargers could be controlled effectively by a ‘Load Management’ system or smart metering technology (that can aggregate peak demands);
- Dependent on location the developer will likely be faced with ‘Network Reinforcement’ Costs which, given the current overheating of the Electrical Network within the M25, could be considerable and may lead to developers reconsidering plans possibly leading to a slowing of development of residential property.
- Who will pay the availability charges (currently circa £1.00 per kVA per month) from Day 1, i.e. a developer will purchase infrastructure (HV/LV cables), and off-site network reinforcement, but a developer then has 3 or 5 years to realise this demand and after this ‘Availability’ payments are levied to off-set the ‘Use of System’ charges that the DNO is still not receiving for operating an enhanced network. Will the Developer, Residents, Management Company, the Borough’s or the DNO’s pay?
- Should a developer proceed and having paid for increased capacity, if this capacity is not realised within a three year period or the availability charges are not being met, then that capacity could be diverted to other areas such that when the forecast increase in power is required for EV the supply capacity is no longer available.