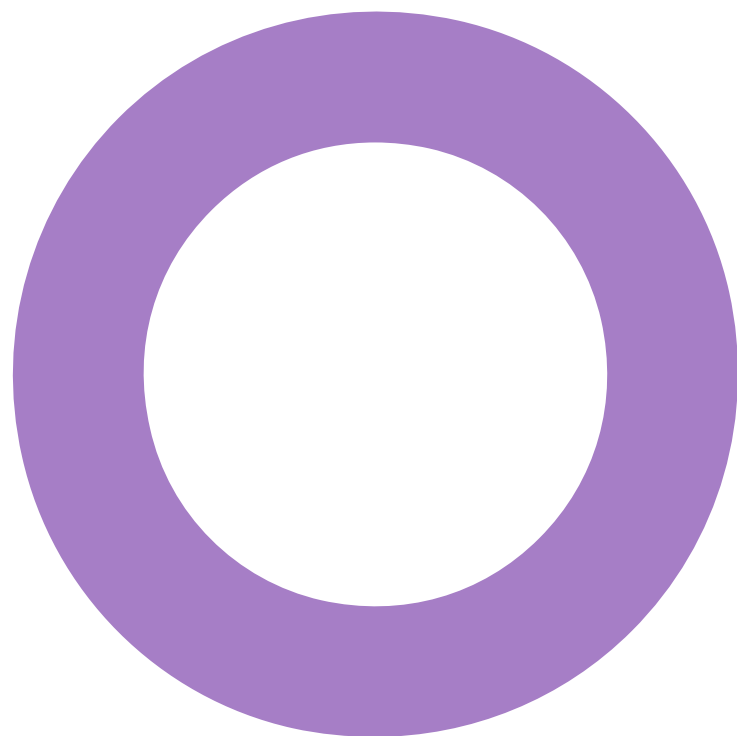


**London Plan.  
London.  
GLA.**

**SUSTAINABILITY**  
LONDON PLAN CONSULTATION RESPONSE

REVISION 01 - 01 MARCH 2018



## Audit sheet.

Rev.	Date	Description	Prepared	Verified
01	01/03/2018	Issue to GLA	TWi/TS	GJ

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## Introduction

This document compiles Hoare Lea response to the Draft London Plan Consultation.

We recognise the ambition presented in the plan and aim to contribute with commentary to shape a sustainable environment for London.

## Hoare Lea Response

The following table details proposed policies from the draft London Plan which fully or partly influence the aspiration for London to be a sustainable, zero-carbon city as well as any significant variation of these proposed policies from adopted policy; the table also provides specific responses to each policy from Hoare Lea.

Policy	Detail	Variation	Hoare Lea Comment
Planning London's Future			
GG1 Building Strong and Inclusive Communities	Promote development that can be seen to be open and attractive to diverse economies, develop diverse and inclusive communities. Ensure that buildings and spaces they create are designed to reinforce and enhance communities including building in adaptability to cater for changing community requirements		<p>The Planning for the Future policies appear to tie a number of the threads of sustainability together particularly Social and Human capital.</p> <p>However, they are largely qualitative and therefore provision of specific metrics that can be used to quantify success of individual policies would be welcomed.</p> <p>Potentially developments could be required to consider the use of benchmarking tools such as the BREEAM Communities and the WELL Communities Standard. Both standards aim to drive the delivery of sustainable and healthy communities through the implementation of appropriate design measures/strategies, technologies and policies.</p>
GG3 Creating a healthy city	<p>Improve overall health and reduce health inequality.</p> <p>Promote a more active and healthy lifestyle, encouraging healthy choice (empowering healthy choice).</p> <p>Healthy streets approach, prioritise health in planning.</p> <p>Consider health and wellbeing on communities in planning applications - both health and health inequality (use Health Impact Assessments)</p> <p>Include access to green spaces and provision of green infrastructure.</p> <p>Ensure high quality, well insulated ventilated to avoid issues associated with damp, heat and cold.</p> <p>Create healthy food environments. Restrict unhealthy options.</p>		<p>To achieve the aspiration for a healthy city, through the creation of healthy streets and buildings, a considered and informed design approach would be required.</p> <p>As stated above (under GG2), specific measures aimed at optimising the health and wellbeing of building users (as promoted by BREEAM and The WELL Building Standard) could be required on development proposals.</p> <p>This provides a credible and transparent means of driving the need for healthier spaces at both building and community scale.</p>
GG4 Delivering the Homes Londoners Need	<p>Deliver housing</p> <p>50% of housing "genuinely affordable"</p> <p>Mixed inclusive communities made up from high quality homes.</p> <p>Identification of a range of sites, including small sites to deliver for localities</p> <p>Plan early for infrastructure</p>		<p>Definition of a "High Quality Home" would be welcomed. With the removal of the Code for Sustainable Homes (CfSH) perhaps developments could be encouraged to consider the Home Quality Mark (HQM) to measure and report against the requirement for "High Quality Homes".</p>
GG6 Increasing Efficiency and resilience	<p>Improve energy efficiency, movement toward low carbon, circular economy. Target of zero carbon city by 2050.</p> <p>Buildings/infrastructure resilient against a changing climate, efficient use of water, reduction of impact from natural hazards such as flooding and heatwaves</p> <p>Avoid contribution to the heat island effect.</p> <p>Safe and secure environments, resilient against impacts such as fire/terrorism etc.</p> <p>Stakeholder contributions taken from all relevant public, private, community sectors.</p>		<p>Currently no requirement to identify how development proposals will be resilient against future climate. This should perhaps be included within the requirements that developments should undertake Climate Resilience assessments (similar to those required of BREEAM) to identify how proposals will be robust and resilient.</p>
GG3 Creating a healthy city	<p>Improve overall health and reduce health inequality.</p> <p>Promote a more active and healthy lifestyle, encouraging healthy choice (empowering healthy choice).</p> <p>Healthy streets approach, prioritise health in planning.</p> <p>Consider health and wellbeing on communities in planning applications - both health and health inequality (use Health Impact Assessments)</p> <p>Include access to green spaces and provision of green infrastructure.</p> <p>Ensure high quality, well insulated ventilated to avoid issues associated with damp, heat</p>		<p>Appears to look at the impact at development scale and does not consider the wider impact. Difficult to identify how individual buildings would reduce health inequality.</p> <p>May be difficult in practice although some themes could be enforced/encouraged e.g.:</p> <ul style="list-style-type: none"> <li>-Smoke free public realm</li> <li>-Pedestrianisation of streets/public realm</li> <li>-Restricted parking</li> </ul>

Policy	Detail	Variation	Hoare Lea Comment
	and cold. Create healthy food environments. Restrict unhealthy options.		
<b>Design</b>			
Policy D7 Public realm	Development plans should ensure they are of good design, including being safe attractive spaces, landscaping, planting etc. The spaces should maximise the contributions public realm can make to active travel, discouraging travel by car and excessive on street parking, traffic noise etc. Public realm should develop sense of place and enhance relationships between the realm and its surrounding buildings. Incorporate Green Infrastructure to support rainwater/surface water management, exposure to air pollution, urban heat island and nature corridors Create spaces that are attractive and encouraging for community events.		In addition to the measures identified, and in order to ensure public realm contributes to an active lifestyle public realm should be designed to incorporate the <i>Principles of Active Design</i> as championed by Sports England.
Policy D13 Noise	Reduce manage and mitigate noise levels. The policy aims to encourage the use of the Agent of Change principle to ensure measures do not unduly impact on existing noise levels. Where levels unduly impact on the development, mitigation of the existing noise levels is considered.  Noise levels of the development itself are limited. Quiet areas and spaces of Tranquillity are protected, and if possible improved and enhanced. Separation of new noise sensitive development from major noise sources, through the use of distance, screening or internal layout in preference to using sound insulation is encouraged. If standards are not achieved, acoustic design principles and insulation are then encouraged.		Promotion of BS8233. No reference to BS4142 assessment. No specific qualification of background noise level assessment and no identification of specific noise level reductions to be achieved i.e. 5dB below background etc.  No noise reduction targets are proposed.
<b>Green Infrastructure and Natural Environment</b>			
Policy G1 Green infrastructure	Green network of infrastructure to be protected and managed as integrated features across the city. Boroughs to prepare green infrastructure strategies that integrate open space provision, biodiversity, flood management, health and wellbeing and sports and recreation.		Target of 50% green city by 2050 seeks to protect and enhance Green Infrastructure. However, no specific metrics included for buildings.  Target levels of urban greening could be included.
Policy G5 Urban greening	Major development should contribute to greening as a fundamental part of the design. Boroughs to develop urban greening factor to identify appropriate level for new development proposals.	The proposed London Plan introduces a new metric; that is, the Urban Greening Factor (UGF) which is considered a useful metric for assessing and driving the uptake of urban greening across London.	Boroughs to set local UGF targets. IN interim, GLA minimum expectations for UGF of 0.4 for residential and 0.3 for commercial developments.  0.4 is the equivalent of 'Amenity grassland (species-poor, regularly mown lawn)'.  0.3 is the equivalent of 'Extensive green roof of sedum mat or other lightweight systems that do not meet GRO Code 2014'.
<b>Sustainable Infrastructure</b>			
SI2 Minimising Greenhouse Gas Emissions	A. Major development should be net zero-carbon. 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: 2. Be lean: use less energy and manage demand during construction and operation. 3. Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly. Development in Heat Network Priority Areas should follow the heating hierarchy in Policy SI3 Energy infrastructure. 4. Be green: generate, store and use renewable energy on-site.	The adopted London Plan requires 35% improvement over Part L 2013 for commercial buildings and net zero carbon (100% improvement) over Part L 2013 with a minimum 35% improvement on-site for residential buildings.  The Draft London Plan proposes that from 2019 both residential and non-residential developments must be zero carbon, with a minimum 35% reduction on site (increasing with time to reflect the need to decarbonise London in order to meet the 2050 target).  Major refurbishments must also meet the zero carbon target.	The calculated emissions reductions for electrical plant, and plant which offsets grid electricity (e.g. CHP) are heavily dependent on the carbon factor of grid-supplied electricity used.  The current Part L 2013 carbon factor, which is used for London Plan energy strategies, is 0.519kgCO <sub>2</sub> /kWh. However, the reported performance of the grid in 2016 was 0.262kgCO <sub>2</sub> /kWh according to the National Grid's Future Energy Scenarios 2017 report or 0.274kgCO <sub>2</sub> /kWh according to the DBEIS Green Book supplementary guidance. This means emissions from electrical plant are being overestimated by up to 98%, whereas emissions savings from CHP are being exaggerated.

Policy	Detail	Variation	Hoare Lea Comment
	<p>9.2.10 As a minimum, energy strategies should contain the following information:</p> <ul style="list-style-type: none"> <li>a. A calculation of the energy demand and carbon dioxide emissions covered by Building Regulations and, separately, the energy demand and carbon dioxide emissions from any other part of the development, including plant or equipment, that are not covered by the Building Regulations (i.e. the unregulated emissions), at each stage of the energy hierarchy.</li> <li>b. Proposals to reduce carbon dioxide emissions beyond Building Regulations through the energy efficient design of the site, buildings and services, whether it is categorised as a new build, a major refurbishment or a consequential improvement.</li> <li>c. Proposals to further reduce carbon dioxide emissions through the use of zero or low-emission decentralised energy where feasible, prioritising connection to district heating and cooling networks and utilising local secondary heat sources. (Development in Heat Network Priority Areas should follow the heating hierarchy in Policy SI3 Energy infrastructure).</li> <li>d. Proposals to further reduce carbon dioxide emissions through the generation and use of on-site renewable energy, utilising storage technologies where appropriate.</li> <li>e. Proposals to address air quality risks (see Policy SI1 Improving air quality). Where an air quality assessment has been undertaken, this could be referenced instead.</li> <li>f. The results of dynamic overheating modelling which should be undertaken in line with relevant Chartered Institution of Building Services Engineers (CIBSE) guidance, along with any mitigating actions (see Policy SI4 Managing heat risk).</li> <li>g. Proposals for demand-side response, specifically through installation of smart meters, minimising peak energy demand and promoting short-term energy storage, as well as consideration of smart grids and local micro grids where feasible.</li> <li>h. Proposals for how energy demand and carbon dioxide emissions post-construction will be monitored annually (for at least five years).</li> <li>i. Proposals explaining how the site has been future-proofed to achieve zero-carbon on-site emissions by 2050.</li> <li>j. Confirmation of offsetting arrangements, if required.</li> <li>k. Proposals to minimise the embodied carbon in construction.</li> <li>l. Analysis of the expected cost to occupants associated with the proposed energy strategy.</li> </ul>		<p>This supports the removal of explicit support for CHP: it has been shown that improvements in grid carbon factor mean CHP networks actually cause a net emissions increase over the gas boiler baseline and their relative performance will continue to worsen as the grid decarbonises further. However, under the current framework using the Part L 2013 emissions factors, CHP is most often the only technology which can provide the 35% CO<sub>2</sub> reduction required by policy. In order for developments to meet this on-site requirement without CHP, the emissions factors used should be updated to reflect the true performance of the grid such that the calculated emissions reductions for electric technologies such as heat pumps are accurate. Further to this, including a requirement to assess strategies using not only current carbon factors, but those projected to the future, will ensure strategies have long-term relevance.</p> <p>This is important in the context of the carbon offset payments: it has been shown that the emissions savings offered by heat pumps in reality can be over three times greater than those calculated using the Part L 2013 carbon factor. With the proposed increase in the carbon offset price per tonne, any inaccuracy in the calculated emissions of a development will have a direct and, in the cases of large proposals, substantial economic impact. To reflect the rapidly changing energy landscape in the UK, the carbon offset payments could be made at key intervals, with the sum calculated to reflect the actual emissions of the strategy at that point in time, using reported carbon factors.</p> <p>If the GLA wish to encourage the shift towards the use of secondary heat sources and electrified heating, the emissions factors should be considered as a priority. Given the rapid reduction in the emissions associated with the use of grid-supplied electricity over the past 4 years and the projected continued decarbonisation, energy strategies would benefit from reporting on both current emissions and projected future emissions. Plant selection and energy performance should be discussed in the context of the anticipated build-out period and lifetime of the proposed plant.</p>
	<p>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 will be expected to monitor and report on energy performance.</p>	<p>There was previously no requirement to monitor and report on energy performance. The Draft Plan proposes that major developments are required to monitor and report on energy performance by displaying a Display Energy Certificate (DEC) and reporting to the Mayor for at least 5 years.</p>	<p>The requirement to monitor and report on energy performance will be important to determine whether energy strategies are being delivered as designed.</p> <p>If this data is provided to the industry, it could be used to better inform future energy strategies, identify any persistent causes of the 'performance gap' and support developers to improve the delivery of their buildings.</p>
	<p>C. In meeting the zero-carbon target a minimum on-site reduction of at least 35 per cent beyond Building Regulations is expected. Residential development should aim to achieve 10 per cent, and non-residential development should aim to achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that</p>	<p>There was previously no specific percentage requirement improvements through passive design and energy efficiency measures.</p>	<p>It is considered appropriate to strengthen energy efficiency and passive design targets, particularly given the support for electrification and potential increased demand on local electrical infrastructure.</p>

Policy	Detail	Variation	Hoare Lea Comment
	<p>the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided:</p> <ol style="list-style-type: none"> <li>1. through a cash in lieu contribution to the relevant borough's carbon offset fund, and/or</li> <li>2. off-site provided that an alternative proposal is identified and delivery is certain.</li> </ol>	<p>Carbon offset payments will continue to be set by the boroughs, but a nationally recognised non-traded price of £95/tonne has been tested as part of a viability assessment for the London Plan – this would represent a 58% increase in the current price.</p>	<p>Given the scope of many refurbishment projects, schemes where there is significant modification to or replacement of the building fabric could also benefit from specific 'Be Lean' emissions reductions requirements, and these should be linked to a 'pre-development' case as opposed to a Part L baseline.</p> <p>An increase in the carbon offset price could be considered beneficial as the current price may not provide enough incentive for developers to maximise on-site emissions reductions. However, any increased payment requirement should be balanced with wider discussions of viability.</p> <p>Currently, it appears that only a small fraction of the money collected in carbon offset payments has been spent.</p> <p>For larger schemes, where the carbon offset contribution is too large for individual boroughs to manage, an option could be for a board of trustees to be established by the developer, borough, and industry to take responsibility for effectively allocating the funds.</p>
	<p>D. Boroughs must establish and administer a carbon offset fund. Offset fund payments must be ring-fenced to implement projects that deliver greenhouse gas reductions. The operation of offset funds should be monitored and reported on annually.</p>	<p>Boroughs were not previously required to report on their carbon offset funds explicitly in policy.</p>	<p>The requirement for boroughs to report on carbon offset fund spending is beneficial and ensuring that the money is ring-fenced for projects that deliver greenhouse gas emissions reductions remains important.</p> <p>The process could benefit from an incentive or requirement for boroughs to spend their carbon offset fund within a given time period. This could be supported by GLA guidance on how to most effectively achieve this.</p> <p>Alternatively, a trust-based system as noted in the response to S12C could be developed..</p>
SI3 Energy Infrastructure	<p>A. Boroughs and developers should engage at an early stage with relevant energy companies and bodies to establish the future energy requirements and infrastructure arising from large-scale development proposals such as Opportunity Areas, Town Centres, other growth areas or clusters of significant new development.</p>	<p>No significant change.</p>	<p>With the encouraged shift to electrification, the energy demands for a development could have increased impact on the resilience of local infrastructure. As such, consultation and coordination with local electricity supply companies at early stages would be beneficial.</p> <p>Whilst annual energy requirements are important in benchmarking the development, it is the peak electricity demand which dictates the necessary substation capacity. Developers could be incentivised to use electricity at times when it is most favourable to the local grid – be that from a resilience or carbon perspective – and could be encouraged to deploy methods of providing demand side response (DSR).</p> <p>Ensuring electric vehicle charging points are futureproofed for vehicle-to-grid (V2G) would also be beneficial.</p>
	<p>B. Energy masterplans should be developed for large-scale development locations which establish the most effective energy supply options. Energy masterplans should identify:</p> <ol style="list-style-type: none"> <li>1. major heat loads (including anchor heat loads, with particular reference to sites such as universities, hospitals and social housing)</li> <li>2. heat loads from existing buildings that can be connected to future phases of a heat network</li> <li>3. major heat supply plant</li> </ol>	<p>Points 2, 5, 6, 7, 9, and 10 have been added to the requirements for energy masterplans.</p> <p>Notable is the need to identify secondary sources and land for energy storage.</p>	<p>The principle that energy masterplans are developed for large schemes continues to be important. This will ensure a coordinated strategy is deployed for large developments and that they are consequentially designed sustainably. Looking to the future, achieving the zero carbon target will be very difficult without developments taking a holistic approach to reducing emissions.</p> <p>The addition of secondary heat sources and land for energy storage to the list of assets to be identified reflects progress in the energy sector.</p>



Policy	Detail	Variation	Hoare Lea Comment
	<ol style="list-style-type: none"> <li>4. possible opportunities to utilise energy from waste</li> <li>5. secondary heat sources</li> <li>6. opportunities for low temperature heat networks</li> <li>7. possible land for energy centres and/or energy storage</li> <li>8. possible heating and cooling network routes</li> <li>9. opportunities for futureproofing utility infrastructure networks to minimise the impact from road works</li> <li>10. infrastructure and land requirements for electricity and gas supplies</li> <li>11. implementation options for delivering feasible projects, considering issues of procurement, funding and risk, and the role of the public sector.</li> </ol>		<p>The plan would benefit from a better framework for incentivising the deployment of energy storage. Appreciation of the emissions reductions which can be realised by deploying energy storage is not currently within the calculation methodology; therefore, energy storage does not reduce a developer's necessary carbon offset contribution. However, energy storage will reduce carbon emissions by offsetting electricity during peak periods when the highest carbon forms of generation are required to bolster the grid. Energy storage could be considered on a par with renewable generating technologies and a suitable mechanism for attributing carbon savings be included. Battery storage will become increasingly important as the grid greens and could be essential to delivering the 2050 zero carbon target.</p>
	<p>C. Development Plans should:</p> <ol style="list-style-type: none"> <li>1. identify the need for, and suitable sites for, any necessary energy infrastructure requirements including upgrades to existing infrastructure</li> <li>2. identify existing heating and cooling networks and opportunities for expanding existing networks and establishing new networks.</li> </ol>	<p>The requirement to identify the need for and site to accommodate additional or improved energy infrastructure has been explicitly included in policy.</p>	<p>As S13A.</p>
	<p>D. Major development proposals within Heat Network Priority Areas should have a communal heating system</p> <ol style="list-style-type: none"> <li>1. the heat source for the communal heating system should be selected in accordance with the following heating hierarchy: <ol style="list-style-type: none"> <li>a. connect to local existing or planned heat networks</li> <li>b. use available local secondary heat sources (in conjunction with heat pump, if required, and a lower temperature heating system)</li> <li>c. generate clean heat and/or power from zero-emission sources</li> <li>d. use fuel cells (if using natural gas 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)</li> <li>e. use low emission combined heat and power (CHP) (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)</li> <li>f. use ultra-low NOx gas boilers.</li> </ol> </li> <li>2. CHP and ultra-low NOx gas boiler communal or district heating systems should be designed to ensure that there is no significant impact on local air quality.</li> <li>3. Where a heat network is planned but not yet in existence the development should be designed for connection at a later date.</li> </ol>	<p>The heating hierarchy was not present in previous versions of the London Plan.</p> <p>Major developments were previously required to deploy a site-wide CHP network where connection to an existing network was not possible. The draft policy now places CHP near the bottom of the hierarchy and places stringent air quality limits on their operation. The supporting text notes <i>"...it is not expected that gas engine CHP will be able to meet the standards required within areas exceeding air quality limits with the technology that is currently available."</i></p> <p>As noted, in cases where it is not possible to connect to an existing network, adopted policy requires deployment of a CHP DHN. However, the draft plan requires developers to exploit secondary sources of heat as the priority.</p>	<p>The principle of a hierarchy for heating, in a sector where technological developments are unpredictable and potentially disruptive, seems inflexible. As such, should progress be made within the sector for a particular technology – fuel cells for example – the hierarchy places restrictions on when a potentially more beneficial technology can be deployed. In response, the hierarchy could be amended to require the deployment of the technology with the lowest overall environmental impact at that point in time, with due consideration of how the technology is projected to perform in future.</p> <p>The benefit of continuing to include CHP is unclear. It has been shown that, if accurate carbon factors are used, CHP actually cause a net emissions increase compared to individual gas boilers, and this situation will only worsen as the grid decarbonises further. In addition to this, even with NOx abatement technology, achieving emissions lower than that of ultra-low NOx gas boilers is a significant challenge for CHP. Given the timescales over which the plan is intended to be adopted, CHP could be actively detrimental to the objective of reducing London's carbon emissions in the future.</p>
Policy S14 Managing heat risk	<p>A. Development proposals should minimise internal heat gain and the impacts of the urban heat island through design, layout, orientation and materials.</p>	<p>No significant change.</p>	<p>See S14B.</p>
	<p>B. Major development proposals should demonstrate through an energy strategy how they will reduce the potential for overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:</p> <ol style="list-style-type: none"> <li>1. minimise internal heat generation through energy efficient design</li> <li>2. reduce the amount of heat entering a building through orientation, shading, albedo, fenestration, insulation and the provision of green roofs and walls</li> <li>3. manage the heat within the building through exposed internal thermal mass and high ceilings</li> </ol>	<p>No significant change.</p>	<p>The need to minimise overheating is recognised and the TM52/TM59 guidance provides a standardised methodology for assessing the risk of overheating.</p> <p>However, the need to provide such a number of iterations, particularly in cases where the local authorities respond to assessments with requests for further iterations using modified design approaches can be convoluted and ineffective. To streamline the process, the GLA or Boroughs could provide specific guidance on which design features</p>

Policy	Detail	Variation	Hoare Lea Comment
	<ul style="list-style-type: none"> <li>4. provide passive ventilation</li> <li>5. provide mechanical ventilation</li> <li>6. provide active cooling systems.</li> </ul>		and performance parameter variations they expect to be included in an overheating assessment.
Policy SI5 Water infrastructure	<p>Development plans to be produced to identify areas of specific water stress.</p> <p>Development plans to be produced to identify areas of specific water stress.</p> <p>Development proposals should minimise the use of water in residential developments in line with Building Regulations. Commercial developments should achieve at least the BREEAM Excellent standard.</p> <p>Smart metering encouraged including in retrofit situations.</p> <p>Development proposals to take account of local wastewater infrastructure, reduce instanced of shared sewerage connections.</p>		<p>To ensure the intent of this policy is achieved, more specific targets would be required particularly with respect to water consumption in commercial developments. We would suggest that targets set in the BREEAM manual be referenced directly; that is:</p> <ol style="list-style-type: none"> <li>1. Water consumption (BREEAM Wat 01) – achieve at least a 12.5% improvement over the baseline performance standard. Improvement on these limits would be strongly encouraged.</li> <li>2. Water monitoring (BREEAM Wat 02) – provide water sub-meters for areas with at least 10% overall water demand of each development to allow for monitoring.</li> </ol> <p>Further consideration of more ambitious water efficiency measures such as rainwater harvesting could be incorporated specifically for water stressed regions. Consideration for how limiting wastage of water from utilities should be strongly encouraged.</p>
Policy SI7 Reducing waste and supporting the circular economy	<p>Waste reduction, improved recycling rates and improved reuse rates are targeted by:</p> <p>Promotion of a circular economy, improving resource efficiency and innovation, encourages waste minimisation waste avoidance through reuse of materials and through using fewer resources in the production and distribution of products.</p> <p>Target of zero biodegradable or recyclable waste to landfill by 2026.</p> <p>Recycling targets for London in line with the below:</p> <ul style="list-style-type: none"> <li>-Municipal waste: 65% by 2030.</li> <li>-Construction, demolition and excavation waste: 95% by 2020</li> </ul> <p>Applications where relevant to include a circular economy statement identifying how above aims will be achieved.</p>		<p>Defra data for recycling rates in London identify that the 2016/2017 recycling rate is 33%. Over the last 5 years this recycling rate has been approximately similar. Therefore, the proposed target of zero biodegradable or recyclable waste to landfill by 2026 appears ambitious.</p> <p>For this to be considered realistic, a fully defined action plan would be required to be developed.</p>
Policy SI8 Waste capacity and net waste self-sufficiency	<p>100% of London's waste managed within London by 2026</p> <p>Existing facilities should be protected and optimised. New waste management facilities will be directed by directed by development plans. These development plans are to identify how waste targets will be achieved and how waste streams will be suitably managed.</p> <p>Specific features that will be particularly encouraged include: complimentary waste material and processing facilities at a single site.</p> <p>Facilities that contribute towards renewable energy generation especially renewable energy/gas production.</p> <p>Can provide CHP/CCHP</p> <p>Effectively identify solutions to deal with CD&amp;E waste.</p> <p>New waste management facilities will be evaluated under criteria that includes scale, jobs, skills, as well as proposals to reuse carbon intensive waste streams and achieve a net carbon positive outcome.</p>		<p>In order to achieve the proposed GLA targets perhaps specific construction and operational waste generation/resource efficiency targets may be required for major developments.</p> <p>BREEAM WST01 offers waste generation benchmarks through construction that could be considered.</p> <p>Further emphasis is perhaps also required on supporting businesses and organisations with respect to implementing the circular economy.</p>
Transport			
Policy T2 Healthy Streets	<p>Development plans to deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling.</p> <p>Opportunities to encourage and facilitate walking, cycling etc through development design will be supported. Improve the balance of space given in public realm and on streets.</p>		<p>The Plan proposals appears to suggest a reduction in the available traditional road vehicle space. This suggests greater priority or potential for shared priority for cyclists/pedestrians on roadways,</p> <p>There is a potential for developments with taxi ranks / drop off zones / car parks etc. (new or existing) to include signage advising drivers to turn off their engines while stationary.</p>

Policy	Detail	Variation	Hoare Lea Comment
Policy T4 Assessing and mitigating transport impacts	<p>Development plans and proposals should reflect and account for the site connectivity and future needs.</p> <p>Development plans should include transport assessment to identify the extent of future impacts and the ability for the transport infrastructure to cater for requirements.</p> <p>Transports should focus on embedding healthy streets approaches into the design</p> <p>Mitigation through direct provision of public transport, walking and cycling facilities will be required in order to address adverse transport impacts of development plans.</p> <p>Overall impacts on the transport infrastructure, as well as the impacts on public health should be taken into account. Where there is a negative impact, this is mitigated.</p>		<p>Modal share information is not included in the required assessment (as a specific requirement). It may be considered worthwhile to introduce carbon assessment/air quality assessment based on anticipated modal share and design/condition around a reduction benchmark.</p> <p>By introducing anticipated modal share information and the associated impact on air quality and (operational) transport related emissions it may be possible to recognise potential for, or a requirement for alternative arrangements.</p>
Policy T5 Cycling	<p>Development plans to support a city wide cycle network.</p> <p>Development proposals should include well designed cyclist infrastructure, designed and provided in line with approved standards.</p> <p>On and off-street cycle parking should be considered.</p>		<p>Cyclist storage appears greater than BREEAM requirements. High levels of cyclist provision are supported, however greater support for cyclist safety/segregation or shared areas should be provided as opposed to provision of extensive onsite cycle storage that may not be effectively used (due to the lack of surrounding cyclist infrastructure).</p>
Policy T6 Car parking	<p>Restricted based on present and future connectivity plans for the specific area.</p> <p>Car free development should be the ultimate aim and the starting point for all development that are well connected by public transport.</p> <p>Provision for Ultra-Low emission vehicles to be provided for all developments</p> <p>Design management plans to be submitted alongside all development plans.</p> <p>Support given to Boroughs wishing to provide car free policies.</p> <p>Redevelopment should include reduction in numbers of car parking.</p>		<p>Benchmark levels would be recommended to be provided dependant on PTAL/air quality levels for specific locations.</p> <p>Limits on car parking should be provided for central London location with high public transport accessibility. Car-free developments should be encouraged.</p> <p>Where a car free development is not feasible, an option for consideration could be licenses for car parking use, for example in high end development that demands car parking. Receipts from licenses might be directed towards air quality initiatives.</p>
Policy T6.1 Residential parking	<p>Maximum car parking capacities identified</p> <p>Residential car parking spaces should feature electric charging points for 20% of the spaces provided, with the remaining space having passive provision (i.e. infrastructure enabling).</p> <p>Large scale purpose build development should be car free.</p> <p>See limits identified by table 10.3</p>		<p>Consideration appears to be suitable balance of limiting car parking spaces and provision for low emission vehicles. Ultimately it is likely that vehicles with higher emissions will be phased out over the next decades, however it should be noted that limitation of car parking might still be sensible to be limited due to other infrastructure pressures such as electricity supply. Limitation of car parking spaces may have implications in the future however where vehicles are expected to feed into dynamic storage and supply networks. A balance in approach will be required.</p> <p>Large scale development might be encouraged to provide hub services for shared 'car club' type facilities.</p> <p>Restrictions should be considered based on air quality levels and PTAL (current and future).</p>



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