

# GLA New London Plan. Policy updates: overview.

HOARE LEA  
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Timber Square is an innovative development that has been designed in line with the UKGBC Net Zero Carbon Buildings Framework. This development consists of two buildings which house partially retained structure and new build elements. As well as targeting BREEAM Excellent, we have been working with the team to optimise both embodied and operational carbon from the project's inception. Timber Square is also a pioneer project under the Design for Performance initiative and is targeting a 5-star rating.

## GLA New London Plan. Policy updates: overview.

**The New London Plan (NLA), which was officially adopted in March 2021, sets out a framework for how London will develop sustainably during the next 20-25 years.**

The Plan is part of the statutory development plan for London, meaning that its policies will inform decisions on planning applications across the capital.

Having been part of the consultation process, we understand the myriad changes compared to the old London Plan (2016). In this summary note, we'll cover the updates to the following policy areas:

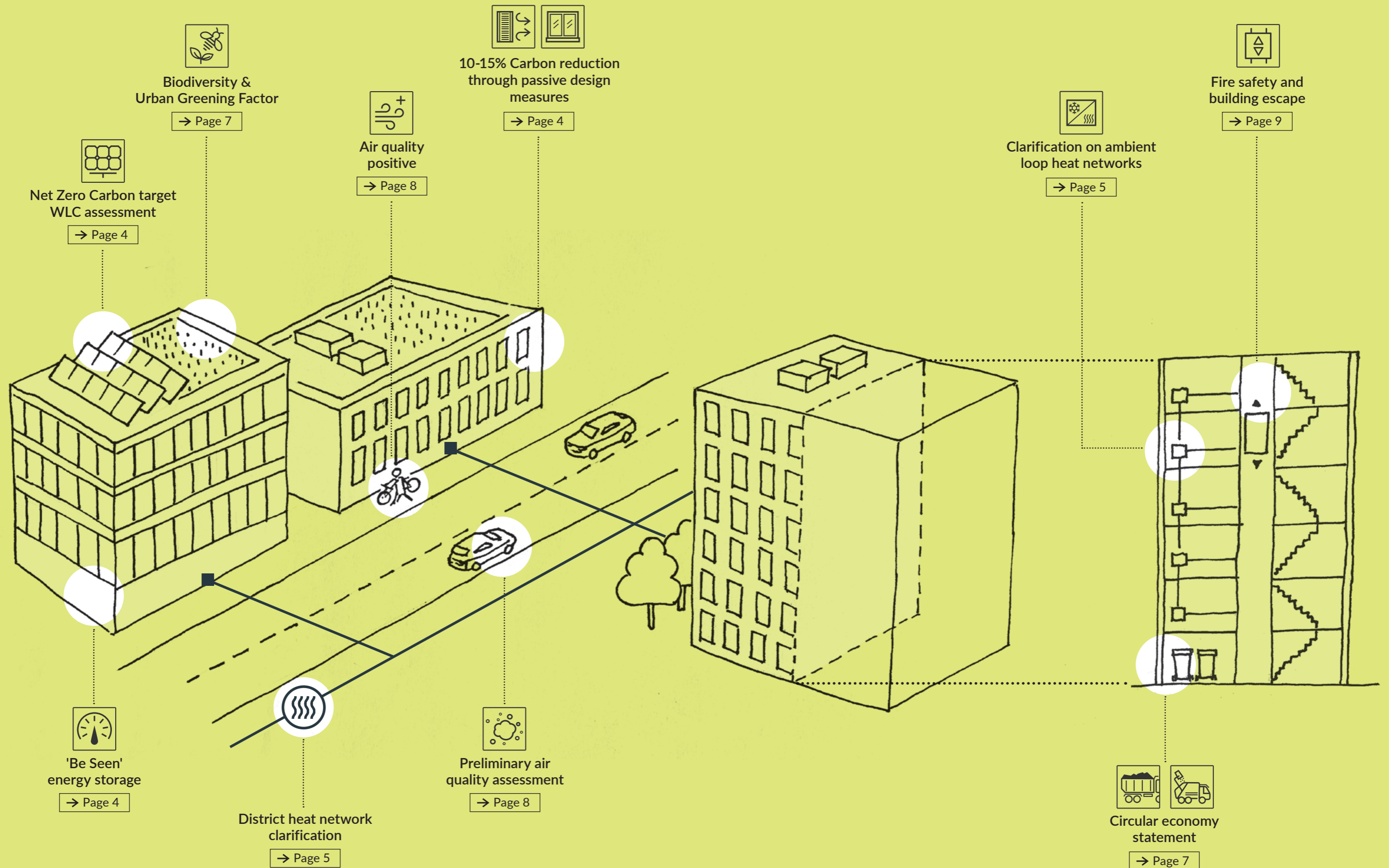
- Air quality in Central London
- Energy consumption and carbon emissions through a whole life-cycle perspective
- Resource and waste management
- Urban green spaces and biodiversity
- Fire safety and building access

### Key policy updates.

Key

LONDON PLAN POLICY REFERENCE

DRAFT SUPPLEMENTARY PLANNING GUIDANCE - NOT FORMALLY ADOPTED YET



# Energy.

The following updates are detailed in

**POLICY SI2 MINIMISING GREENHOUSE GAS EMISSIONS** and **POLICY SI3 ENERGY INFRASTRUCTURE**

These policies are further supported by a **DRAFT ENERGY ASSESSMENT GUIDANCE (2020)**

The key updates from energy policies reflect the GLA's ambition for London to reach net zero carbon by 2030.

## Requirement: Whole Life-Cycle Carbon Assessment.

**DRAFT WHOLE-LIFE CARBON ASSESSMENTS GUIDANCE**

The new London Plan energy policies place a strong focus on the lifecycle impact of a development. One of the new requirements in response to this is a whole-life carbon assessment. Whilst the WLC assessment is not subject to the Mayor's net zero carbon target, applicants must calculate anticipated operational energy consumption and consequent carbon emissions using a robust methodology i.e. beyond that calculated by a building regulations compliance assessment (in line with 'Be Seen' requirements; see below).

The intention of the assessment is not only to measure emissions but also drive design and strategic decisions that reduce the whole life carbon emissions of the development. The development will be compared against the GLA benchmarks for relevant building types, such as residential and commercial office. The ease with which these benchmarks can be met is yet to be seen, but the guidance suggests compelling justification for exceeding the targets would need to be provided.

## 'Be Seen' – new step in Energy Hierarchy (energy monitoring and reporting).

**DRAFT 'BE SEEN' ENERGY MONITORING GUIDANCE**

This is the last step in the new GLA Energy Hierarchy, which requires developments to predict, monitor and report operational energy usage during in-use stages. This is a big update as operational energy was not regulated in any way prior to this. The new guidance recognises the need to close the 'performance gap' between design intent and actual building performance, and sets out requirements for energy use monitoring and reporting for the first five years of building occupation.

The 'Be Seen' spreadsheet is the single route of compliance with the policy and applicants are required to submit it to the GLA at the following stages: planning stage, as-built stage and in-use stage (year 1-5). At the end of each stage the spreadsheet should then be submitted to the GLA along with any other relevant material. The spreadsheet should be submitted a total of seven times.

## Carbon offset rate increases from £60/tonneCO<sub>2</sub> to £95/tonneCO<sub>2</sub>.

- All major commercial developments are expected to be net zero carbon, aligning with the residential requirement. A minimum 35% of carbon saving is to be achieved on-site via passive design measures, connection to district energy networks, and/or the implementation of low/zero carbon technologies.

- Remaining carbon must be offset via payment to an offset fund set up by the local borough.
- Offset funds are intended to finance renewable technologies and energy efficiency programmes in the local area.

There is further guidance on carbon offsetting for organisations and developments by the UKGBC in the 2021 report '*Renewable Energy Procurement & Carbon Offsetting Guidance for net zero carbon buildings*':

- Principles for carbon offsetting
- Guidance on purchasing carbon offset credits
- Minimum reporting requirements for net zero carbon buildings

## Continued emphasis on district heat networks

The latest energy assessment guidance clarifies the GLA's position on district heat networks, with a clear note on the definition of individual and communal heating systems. Individual heating systems, such as an ambient loop heat network, are not considered suitable for developments in the Heat Network Priority Area (HNPA). The HNPA sets out areas in London where the heat density is considered sufficient for communal heat networks to provide a competitive solution for supplying heat to buildings and consumers. In addition to this clarification, the guidance also stipulates that, for all new developments within the HNPA, a single connection point should be provided to facilitate a future connection to an area-wide district network.

## Food for thought.

### How will district heat networks form part of the decarbonised energy landscape?

We are part of the industry group London Energy Transition Initiative (LETI), which is a group of passionate practitioners in energy and sustainability. The group acknowledges the benefits of connecting to a typical gas-powered district heat network operating at 70°C flow and 40°C return, but cautions the reliance on gas infrastructure which is still inherently carbon intensive. A step change from this type of heat networks is required, and many consider an electric ambient loop heat system or a fifth-generation heat-share model to be the future.

Compared to centralised heat pump systems, ambient loop systems can deliver heat more efficiently. As such, they have been identified as a potential mechanism in accelerating the decarbonisation of domestic heat. However, there is continued debate on the suitability and the regulation required to scale up ambient loop heat-sharing networks.

## Wider sustainability.

### Requirement: Circular Economy Statement.

POLICY S17: REDUCING WASTE AND SUPPORTING THE CIRCULAR ECONOMY

DRAFT CIRCULAR ECONOMY STATEMENT GUIDANCE

In addition to the Whole-life Carbon Assessment, referable applications are also required to provide a Circular Economy Statement, which focuses more on the material lifecycle of buildings. The overall aim is to encourage design teams to consider circularity, flexibility and adaptability from the earliest design stages to embed key opportunities for reducing material use and waste generation in the design proposal. The Circular Economy Statement requires the development to commit to key performance indicators around material efficiency, waste generation, and diversion of waste from landfill, which will be used to verify as-built information post-construction.

### Requirement: Urban Greening Factor (UGF) calculation.

POLICY G5: URBAN GREENING

The Urban Greening Factor is introduced as a way to quantify the amount of urban greening a development will add to the local area. The UGF will assess both the area of green areas but also the type of greening, and each local borough is expected to either adopt the GLA minimum thresholds or devise their own. This calculation will be performed by a landscape consultant. Landscape design should form part of the early design brief to ensure opportunities for urban greening are explored and maximised where possible on site.

### Biodiversity Net Gain.

POLICY G6: BIODIVERSITY AND ACCESS TO NATURE

The concept of Biodiversity Net Gain is introduced to further encourage developments to manage impact on biodiversity and aim to secure a net gain in biodiversity. This should be informed by the latest ecological information and addressed from the start of the development process.



**Bishopsgate Goods Yard** is a masterplan project that will create a new destination in the city's creative district, transforming the currently derelict site of a goods depot that has lain idle since 1964. We developed a site-wide energy strategy using air source heat pumps, alongside the constraints of existing rail infrastructure and listed buildings to create a mix of retail, workplace and homes.

# Air quality.

The following updates are detailed in

**POLICY SI1 IMPROVING AIR QUALITY** and a **DRAFT AIR QUALITY POSITIVE GUIDANCE (2021)**

## Requirement: Preliminary air quality assessment.

A preliminary air quality assessment will now be required to assess likely sources of pollution, likely site constraints, appropriate land uses and appropriate design measures to reduce exposure to poor air quality before design in order to inform the design process (which would sit outside of planning). This approach will hopefully lead to more air-quality-friendly design solutions and encourage developers to consider air quality as an important input to the design of a new development.

## Air Quality Neutral, Air Quality Positive.

The Policy SI1 is introduced to specifically address air quality within London and focusses on reducing the risk of exposure to poor air quality. It notes that whilst new development is encouraged, it should not lead to further deterioration of poor air quality, create new areas of poor air quality or create an unacceptable risk of exposure to poor air quality. Air Quality Neutral is to be demonstrated through an Air Quality Assessment.

Air Quality Positive (AQP) will be required to be considered for developments within the central activities zone (CAZ), for larger developments subject to an EIA and for airport expansion projects. At this stage it is expected that new developments subject to AQP will have to contribute to an improvement in local air quality by looking at transport emissions (does the development promote sustainable travel?) and building emissions (will there be any energy centre emissions?) but the extent to which this improvement is required is currently unknown.

## Requirement: Air Quality Positive statement.

A pre-consultation draft (March 2021) outlines the requirements for an Air Quality Positive Statement. This requirement will be applicable to major developments that are also subject to the requirement of an Environmental Impact Assessment (EIA). Further detail to be confirmed in the near future.

## World Health Organisation (WHO) guidelines for particulate matter.

WHO guidelines are a more stringent target for PM concentrations to comply with. Given the background concentrations of PM<sub>2.5</sub> across many Central London locations widely exceeds the WHO guidelines, this is likely to lead to more site-specific monitoring undertaken to ascertain on-site concentrations and determine the level of mitigation required. Design implications such as PM filtration in HVAC systems may be required dependent on pollutant levels.

# Fire safety and building access.

The following updates are detailed in

**POLICY D5 INCLUSIVE DESIGN** and **POLICY D12 FIRE SAFETY**

In addition, there is also a **DRAFT FIRE SAFETY GUIDANCE (2021)**

## Fire safety policy overview.

The new London Plan places stronger emphasis on fire safety following the Grenfell Tower tragedy and subsequent reviews of building regulations. Development proposals are required to demonstrate the highest standard of fire safety is achieved through the following steps:

- Identify suitably positioned unobstructed outside space for fire appliances placement and evacuation assembly point
- Design to incorporate appropriate features that reduce the risk to life and risk of serious injury in the event of a fire, including appropriate fire alarm systems, and passive and active fire safety measures
- Construct in an appropriate way to minimise risk of fire spread
- Provide suitable and convenient means of escape, and associated evacuation strategy for all building users
- Develop a robust strategy for evacuation that can be periodically updated and published, which all building users can have confidence in
- Provide suitable access and equipment for firefighting, which is appropriate for the size and use of the development

## Requirement: Fire statement.

All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor. The aim of the Statement is to address the main fire safety principles, and provide an overview of the requirements and recommendations to be met by developments.

## Inclusive design, disabled access.

In addition to existing requirements for disabled access and inclusive building design, a new policy requirement is for developments to provide safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate building users who require level access from the building.



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