

London Borough of Hammersmith & Fulham

Schedule of Representations & Officer Responses to the Climate Change Supplementary Planning Document Consultation (Including technical changes schedule)

The proposed changes are expressed as ~~strike through~~ for deletions and underlining for additions to the text.

NB. Officer comments and amendments have been made against the [Draft Climate Change SPD 2023](#), therefore please refer to the consultation version of the Supplementary Planning Document for correct page and paragraph numbers when looking at this schedule.

Contents – Representor Order

Natural England	1
Dianne Murray	1
OPDC	3
Richard Jackson	5
TTL Properties Ltd	6
TfL	9
Sonia Falconieri	11
Marine Management Organisation (MMO)	12
Historic England.....	15
CPRE London	17
Swifts Local Network	19
Alison Hancock	28
ECDC (Earls Court Development Company)	34
John Rowles	45
Hammersmith BID	50
The Woodland Trust	51
Ealing Front Gardens Project	53
Michael Pritchett	57
GLA	58
Telereal Trillium	60
Schedule of Minor Technical Changes	62

Rep No	Consultee No	Consultee Name	Section/ paragraph/table	Comments	Officer response
1	1	Natural England	General/ SEA Screening	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England has no comments to make on the Climate Change Supplementary Planning Document & SEA Screening</p> <p>The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.</p> <p>Should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.</p>	<p>Comments noted.</p> <p>No change required.</p>
2	2	Dianne Murray	General	<p>As a local social housing resident I welcome this practical and helpful document. Some thoughts/feedback</p> <p>Would be good to see a local image of "No mow May" - just noticed signs for this on the Imperial College W12 site by Scale Space. Anyway, thank you for this work - another reason I love living in LBHF.</p>	<p>Comments noted. We are keen to keep the document concise and focussed on planning issues relating to Climate Change.</p> <p>No change required.</p>
3	2	Dianne Murray	Retrofitting Homes	<p>Noise can be a big problem when opening windows in LBHF - particularly in a courtyard style building which amplifies sound. How to plant a wellbeing garden Gardens The Guardian. The book "Your wellbeing garden" has a section on planting to absorb sound.</p> <p>https://www.theguardian.com/lifeandstyle/2020/mar/14/how-to-plant-a-wellbeing-garden</p> <p>This could help design this in from the beginning in large scale gardens or help with a retrofit. Noise is also a problem when a children's playsite is designed in front of a tall block of flats with</p>	<p>Noise is not covered in detail in the SPD but we note the comment about the role of planting in absorbing noise. There is a section in the Air Quality Chapter (KP 14) commenting on how "Planting improves air quality", so we can note there that planting can also help to reduce local sources of noise such as traffic. KP 16 on Green Infrastructure also refers to the benefits on planting, so we can add the noise reduction benefits in that section as well.</p>

				stacked balconies - eg new social block on Berekley Homes Westfield W12 site.	<p>Proposed Change:</p> <p>KP14: “Planting improves air quality <u>and reduces noise impacts</u>”: By planting up more of our surrounding surfaces such as walls, roofs, buildings and fences around our gardens we can substantially reduce harmful particulates that pollute the air. <u>Planting can also help to reduce local sources of noise such as traffic”.</u></p> <p>KP 16: “Aim to increase soft planting and landscaping. Choosing appropriate trees and climate resilient plants in gardens and on balconies, parking areas and around commercial buildings can help mitigate climate change effects. Even planters on balconies can make a difference, mitigating against heat, and attracting insects. <u>Planting can also provide air quality and noise reduction benefits”.</u></p> <p>Comments on greening noted. We are keen to keep the document concise and focussed on planning issues relating to Climate Change, and design details are provided in the Planning Guidance SPD which is signposted in paragraph 2.41.</p> <p>No change required.</p>
4	2	Dianne Murray	Transport and Movement	Far more work is needed on how to secure bike parking on open estates. Bike shed locks get repeatedly cut either by thieves or people who've lost their key and aren't prepared to wait to get another one through the right channels.	<p>The SPD advocates secure cycle parking and KP11 refers to cycle standards. Transport for London’s (TfL) cycle standards are used in determining planning applications and these standards set out cycle security/ secure parking standards. How this is achieved on the council’s housing estates is beyond the remit of planning guidance.</p> <p>No change required.</p>

5	2	Dianne Murray	Case Studies	<p>Would be great to see more social housing included in the visuals/case studies. This can encourage housing associations to get more actively involved. LBHF has a high percentage of social housing, so this is a key audience of change influencers. Relatedly, would be good to see examples of greening tall buildings - over 4 stories.</p>	<p>Comments noted. Social housing examples are included where relevant in the visuals and case studies. For example Queen Caroline Estate.</p> <p>The case studies section has been amended to focus on local examples.</p>
6	3	OPDC	General	<p>OPDC welcomes the supplementary guidance that sets out a collective ambition to mitigate impacts on climate change and achieve net zero carbon emissions by 2030. It offers effective guidance that supplement Local Plan policies relating to climate change and long-term sustainability on sustainable design and construction, air quality, flooding, energy, ecology, waste, and transport and travel.</p> <p>The draft SPD provides clear guidance in the form of key principles and good practice examples that can be taken to minimise the impact of climate change on the built and natural environment.</p> <p>The approach embedded in the SPD would apply to all new build homes, extensions and retrofitting of homes, non-domestic and mixed-use developments. The key intervention visual diagrams for each type of planning application is very useful. This potential and detail to take action on climate change and to reduce emissions complements the views of OPDC.</p>	<p>Support noted.</p>
7	3	OPDC	Sustainable Design and Construction	<p>OPDC welcomes the emphasis on efficient and sustainable building practices especially around construction, demolition and embodied carbon.</p>	<p>Support noted.</p>

8	3	OPDC	Energy	<p>OPDC welcomes the emphasis on net zero carbon buildings for smaller developments. The importance of retrofitting to improve energy efficiency in existing building stock is also supported. Including details on low carbon heating system; clean energy sources; embodied carbon; high thermal density and good insulation values on roofs, walls and underfloor; renewable energy generation; ventilation; overheating and orientation. Reference to Passivhaus standards and mitigation of Urban Heat Island effect for future proofing is also welcomed.</p> <p>The inclusion of water management through efficient fittings and heat recovery is also supported.</p> <p>A balanced approach on buildings in conservation area, listed and locally listed buildings is welcomed.</p>	<p>Support noted and welcomed.</p> <p>No change required.</p>
9	3	OPDC	Air Quality	<p>OPDC is pleased to see actions related to air quality issues, especially those related to increased exposure. To further strengthen the ability of planning to manage exposure, the SPD could also provide guidance for development with and/or near sensitive uses and users.</p>	<p>Support noted. We are keen to keep the document concise and focussed on planning issues relating to Climate Change. The Planning Guidance SPD provides detailed information, technical guidance and key principles relating to air quality and sensitive uses.</p> <p>No change required.</p>
10	3	OPDC	Flooding and Sustainable Drainage	<p>OPDC supports the approach to managing risks of surface water and sewer flooding. The draft SPD provides detail on basement flooding and prevention measures such as sewer backup prevention, pumps, flood cavities and sump pumps which is welcomed.</p>	<p>Support noted and welcomed.</p> <p>No change required.</p>
11	3	OPDC		<p>OPDC is pleased to see the recognition of the vital role of green infrastructure and nature recovery to mitigate the impacts of high temperatures, flood risk reduction and biodiversity maintenance.</p> <p>The requirement from all types of development including the requirement of environmental quality of open spaces, biodiversity, tree root protection, native species, rewilding, reducing hardstanding, green/brown roofs and the phasing out of pesticide use are welcomed. This will achieve an accumulative positive environment and support nature recovery.</p>	<p>Support noted.</p>

12	3	OPDC	Waste	OPDC welcomes the waste hierarchy and guidance to promote reduction, re-use, recycling and recovery to achieve household waste and recycling targets. It covers the need to provide convenient and accessible waste disposal internally and externally. OPDC also welcomes encouragement of composting of organic waste.	Support noted.
13	3	OPDC	Transport and Movement	OPDC is pleased to see that active, efficient and sustainable travel is prioritised. A well-designed public realm and promotion of pedestrian-friendly and cycle friendly transport network aligns with OPDC's objectives.	Support noted.
14	4	Richard Jackson	Flooding and Sustainable Drainage	<p>Referencing your recent posting on H&F News with regard to the Local Plan, may I suggest a new planning requirement?</p> <p>My understanding of the building regulations is that a soakaway has to be a minimum of 3 metres from a property. LB Hammersmith and Fulham has a large number of Victorian properties, that are periodically renovated and refurbished, but have small back gardens in excess of 5 metres.</p> <p>Could a future planning requirement be that the rainwater from the BACK roofs of the property under renovation be diverted into a soakaway rather than enter the combined sewer system? This could help alleviate flooding of properties by reducing the volume of water entering the sewage system, would be at no cost to the taxpayer, and be an environmentally friendly solution.</p>	<p>We agree that soakaways can be suitable for some sites, subject to Building Regulations requirements such as the "5m rule" and the presence of suitable ground conditions etc. However, setting a specific requirement for their inclusion is not something we can do in the SPD, as we cannot introduce new policies in SPDs. However, we can specifically highlight that soakaways are an option in the relevant section.</p> <p>Proposed Change:</p> <p>Paragraph 2.53: "This can be implemented by using permeable or pervious hard surfaces in designs for car parking areas or patios and hard landscaped areas for example, or by directing surface water into soft landscaped areas where it can infiltrate into the ground. <u>In locations with suitable soils, soakaways may be possible to help manage run-off, so long as they are designed and installed to comply with Building Regulation requirements such as the "5m rule"</u>".</p>

15	5	TTL Properties Ltd	General	<p>Thank you for providing the opportunity to comment on the Draft Your Vision Our Future Consultation. Please note that our representations below are the views of the TTLP planning team (previously known as TfL Commercial Development (CD)) in its capacity as a landowner in the borough only and are separate from any representations that may be made by TfL in its statutory planning role and / or as the strategic transport authority for London.</p> <p>Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties. Transport Trading Limited Properties Limited (TTLP) TfL owns around 5,700 acres of land across London and some of the surrounding boroughs, including buildings, land attached to tube, railway and bus stations, highways and worksites. TfL has set up a dedicated commercial property company, Transport Trading Limited Properties Limited (TTLP), to deliver housing in high demand areas and provide an increased revenue stream, and also to manage its commercial estate and undertake other development projects. TTLP is a significant landowner in the Borough.</p> <p>Our projects are driven by optimising housing delivery in sustainable locations within developments which are sensitive to their context and communities, and which build on our legacy of design excellence. Key deliverables include 50% affordable housing across our London-wide portfolio of publicly-owned land and the enhancement of public transport infrastructure. Many of our sites are located next to busy transport hubs and our projects play a vital role in meeting London's priorities to build affordable homes, create healthy streets and neighbourhoods, improve air quality, encourage sustainable travel choices, provide transport infrastructure improvements (such as step-free access and better public realm), and support small and independent businesses.</p> <p>We do all this while also generating vital revenue to reinvest in improving London's transport network. TTLP have also prepared a 'Sustainable Development Framework' (SDF)¹ which consists of 98 Key Performance Indicators (KPIs) to monitor and grade the sustainability of TTLP's development schemes, ensuring that good practice is achieved as far as possible.</p>	<p>Comments noted.</p> <p>No change required.</p>
----	---	--------------------	----------------	--	--

16	5	TTL Properties Ltd	Net Zero Carbon Buildings – Page 16	<p>TTLP broadly supports section 16 which mentions that new major developments must demonstrate the KPIs defined by LETI which aligns with TTLP's Sustainable Development Framework's Leading Practice scores.</p> <p>However, we express that the proposed approach to whole life carbon is very ambitious and may not be realistic and achievable for all development proposals. The Mayor has published guidance on Whole Life Carbon Assessments and we would advise you to follow this. TTLP's Sustainable Development Framework has a section on High Performance Buildings which incorporates 29 KPIs. We utilise these KPIs to monitor and maintain our development schemes are meeting carbon reduction goals.</p> <p>We suggest that Passivhaus standards should be greatly welcomed to achieve high performing energy buildings. This is supported by London Plan Policy S1 (Minimising Greenhouse gas emissions) which proposes that major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy. This is a requirement which is helping drive an increasing uptake of Passivhaus schemes in London.</p> <p>TTLP would like to express that if the calculation of Energy Use Intensity (EUI) is required for planning submissions that it should be made explicit as this is not currently standard on planning submissions.</p>	<p>Support and comments noted.</p> <p>We are aware of the GLA's Whole Lifecycle Carbon Assessment approach and guidance. This is referenced in the SPD in the section on Embodied Carbon (paragraphs 2.26-2.27).</p> <p>The use of the Passivhaus standard is also welcomed and this is referenced in KP 1 for Building Form and Fabric; KP 3 (Ventilation and Overheating) and Para 2.24 of the section on Low Carbon Heating and Renewable Energy.</p> <p>Four of the case studies give examples of Passivhaus developments.</p> <p>Regarding Energy Use Intensity (EUI), balancing the EUI is recommended in the Net Zero Carbon Building section, but this is not set as a requirement.</p> <p>No change required.</p>
----	---	--------------------	--	---	---

17	5	TTL Properties Ltd	Transport and Movement – page 31	<p>KP11 TTLP are supportive of this approach which mentions that development must make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes. However, KP11 could mention the use of Public Transport Accessibility Level (PTAL) as a tool which can help to optimise the capacity of any development. This will provide opportunity to redevelop station car parks. Public Transport</p> <p>Accessibility Levels (PTAL) are key in establishing optimised densities for development sites. To be positively prepared, the approach could go further to identify that areas with higher PTAL in the borough are likely to be the most suitable areas for higher density development.</p> <p>We broadly support this approach and the acknowledgment to ensure that any impacts on London’s transport networks and supporting infrastructure are mitigated. Any development on TfL operational land must be consulted with us and TfL Spatial Planning. The operational bus stations meet TfL’s operational needs to deliver growth in the future bus network and must be retained as part of any redevelopment unless a suitable site for relocation is secured and agreed with TfL prior to any redevelopment of either site. This approach to development on these sites will ensure that this objective can be achieved.</p>	<p>Support noted. However, the approach to maximising development capacity is not within the scope of this SPD. The approach is set out in policy, rather than SPD guidance within the London Plan, and the London Plan approach includes PTAL considerations (policies GG2, H1 and H2 in particular). The H&F Local Plan policy T1 also advocates the same approach.</p> <p>No change required.</p>
18	5	TTL Properties Ltd	Air Quality	<p>KP14 Air Quality: Retain trees – PG 34 We support the provision and retention of trees that have high amenity value on site and across the borough. However, the retention of trees should be based on an arboricultural assessment of the individual trees on the site to ascertain whether it is suitable for retention as part of the development.</p>	<p>Comments noted. KP14 is best practice - the felling of trees outside conservation areas or where there is no TPO does not require planning permission. Key Principle BD9 in the Planning Guidance SPD does however provide more detail including felling and planting of new trees. In practice the council requests a tree survey if trees are present.</p> <p>No change required.</p>
19	5	TTL Properties Ltd	Case Studies	<p>TTLP acknowledges the case studies provided in the SPD which are useful to showcase best practice within the borough. However, we suggest that the Embodied and Operational Carbon figures for each case study is provided to see how they relate to the London Borough of Hammersmith and Fulham’s targets.</p>	<p>Comments noted. The aim of signposting the case studies in the SPD is to identify further reading for applicants. We consider that it would be misleading for them to be used as a benchmark for applications in LBHF.</p> <p>The case studies section will be amended to provide local case studies where possible.</p>

20	6	TfL	General	Thank you for consulting Transport for London (TfL). We have reviewed the 'Transport and Movement' section of the draft Climate Change SPD and although we support the underlying principles, we have the following detailed comments and suggestions.	Comments noted.
21	6	TfL	Transport and Movement	<p>KP11 – Key Principles – What You Must Do All Development The third bullet point states 'Provide an Active Travel Strategy' This is not a requirement of the London Plan and further guidance may be required in the Local Plan to set out what is expected. However we would expect major developments to carry out an Active Travel Zone (ATZ) Assessment in line with TfL guidance on Transport Assessments.</p> <p>The final bullet point should read 'All development to align with London Plan car and cycle parking standards'</p> <p>Major Developments The final bullet point should read 'A full and comprehensive Transport Assessment and Travel Plan will be required to support the proposals in accordance with London Plan Policy T4 and TfL guidance, with a separate Inclusivity Statement in line with London Plan policy D5</p> <p>KP12 – Key Principles – What You Can Do Major Developments We believe that 'Provide facilities to encourage cycling, such as secure parking and cycle storage' should be listed under KP11 rather than KP12 and applied to all developments. Where car parking is provided, electric vehicle charging points should also be a requirement and would be better placed under KP11.</p>	<p>Agree.</p> <p>Proposed Change:</p> <p>KP11 All Development: DELETE 3rd bullet point as suggested:</p> <ul style="list-style-type: none"> • Provide an Active Travel Strategy <p>Comments noted on content of any future Local Plan. Borough-level guidance is already provided in the council's Planning Guidance SPD. Key Principle - TR12 advocates the principles set out in The Mayor's Manual for Streets Guidance (2017) and Healthy Streets for London (2017) to encourage active travel in new developments. Agree with representation regarding updated references to London Plan and TfL Guidance in respect of major development.</p> <p>Proposed change:</p> <p>KP 11 Under Major Development - ADD new bullet</p> <ul style="list-style-type: none"> • Major developments must carry out an Active Travel Zone (ATZ) Assessment in line with TfL guidance on Transport Assessments. <p>Proposed change:</p> <p>KP 11 Under All Development Change final bullet point to read: 'All development to align with London Plan car and cycle parking standards'.</p> <p>Agree with representation.</p>

					<p>Proposed change:</p> <p>Under Major Development update final bullet point:</p> <p>‘A full and comprehensive Transport Assessment and Travel Plan will be required to support the proposals <u>in accordance with London Plan Policy T4 and TfL guidance</u>, with a separate Inclusivity Statement in line with London Plan policy D5.</p> <p>Agree with representations of providing cycle facilities and EV charging points in major developments.</p> <p>Proposed change:</p> <p>MOVE first and second bullet point from KP12</p> <p>KP12 – Key Principles – What You Can Do Major Developments</p> <ul style="list-style-type: none"> • Provide facilities to encourage cycling, such as secure parking and cycle storage. • Provide electric charging points (EVs) in car parking spaces to encourage a switch to low emission electric vehicles. <p>KP 11 add new bullet points:</p> <ul style="list-style-type: none"> • <u>Provide facilities to encourage cycling, such as secure parking and cycle storage.</u> • <u>Provide electric charging points (EVs) in car parking spaces to encourage a switch to low emission electric vehicles.</u>
--	--	--	--	--	---

22	6	TfL	Air Quality	KP14 – Key Principles - What You Can Do Although we welcome the recognition that ‘Make sustainable travel choices’ is an important action to improve air quality it may be useful to also reference the Transport and Movement’ requirements in KP11 and KP12 which are more comprehensive.	Paragraph 2.41 in the Air Quality chapter does provide reference to the sustainable travel requirements set out in the London Plan, and Local Plan, alongside guidance in the council’s Planning Guidance SPD. No changes required.
23	6	TfL	Checklist and Glossary	The fourth point should read ‘Will your development align with London Plan car and cycle parking standards?’ We hope that these comments are helpful and will be taken into account when the SPD is finalised.	Agree. Proposed change: Change 4th point in the ‘Transport and Movement’ Checklist to read: Will your development align with London Plan car and cycle parking standards?’
24	7	Sonia Falconieri	General	As a resident of the borough I welcome that the council is taking actions to improve the environmental standards of our homes which are most definitely not adequate to combat the current climate crisis. However I have a few comments on the proposed drafts. Finally, the UK is one of few countries that is not providing any incentive, either as grants or tax deductibility, to homeowners to carry these improvements which are significant at a period where homeowners are already strained. This does not reflect in my opinion a serious and committed strategy towards tackling the poor environmental standards of the buildings in the borough.	Comments noted. This Climate Change SPD has been prepared to gather the most relevant climate change policy and guidance in one place for those looking to retrofit or develop in the borough. It must be read alongside our other planning documents when preparing planning applications.
25	7	Sonia Falconieri	Retrofitting Homes/ Heritage and Conservation	Firstly and foremost I think the new guidelines remain very limiting for houses in conservation areas. Still too much emphasis is being put on preservation of character in the face of the climate crisis we are facing and considering that a. these are in fact the buildings in most need of environmental upgrades; b. The extensive conservation area within the borough.	Comments noted. National Planning Policy constrains actions that can be taken in Conservation Areas through permitted development. The Council is unable to adjust these constraints as these are set nationally by the Government. The Council encourages upgrades to property in Conservation Areas while ensuring that the is respectful of heritage in the borough. Conservation Area boundaries are reviewed as part of the Local Plan based on the contribution they make to heritage in the borough. These boundaries will be

					reassessed as part of the next Local Plan review.
26	7	Sonia Falconieri	Case Studies	Secondly, I find the case studies presented useless. These are in fact advertisement for the Ecofurb company which is frankly unacceptable. They do not provide any photos of the improvements carried, nor details about how they were implemented and their cost.	Comments noted. The aim of signposting the case studies in the SPD is to identify further reading for applicants. The case studies section will be amended to provide local case studies where possible and remove reference to individual companies.
27	8	Marine Management Organisation (MMO)	General Comment	<p>MMO Marine Planning and Marine Licensing response to London Borough of Hammersmith and Fulham - Climate Change Supplementary Planning Document</p> <p>Thank you for giving us the opportunity to comment on the Climate Change Supplementary Planning Document.</p> <p>As the marine planning authority for England, the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent the Marine Plan boundaries extend up to the level of the mean high water spring tides mark (which includes the tidal extent of any rivers), there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark.</p> <p>Marine plans will inform and guide decision makers on development in marine and coastal areas. Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure the necessary considerations are included. In the case of the document stated above, the South East Marine Plan is of relevance. The plan was published for public consultation on 14th January 2020, at which point it became material for consideration. The South East Marine Plan was adopted June 2021, alongside the North East, North West, and South West. The South East Marine Plans cover the area from Landguard Point in Felixstowe to Samphire Hoe near Dover, including the tidal extent of any rivers within this area.</p> <p>All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in</p>	<p>Comments on the MMO's role and responsibilities are noted.</p> <p>No change required.</p>

				<p>accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan, in this case the South East Marine Plan, or the UK Marine Policy Statement (MPS) unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance, Explore Marine Plans and the Planning Advisory Service soundness self-assessment checklist.</p> <p>Marine Licensing The Marine and Coastal Access Act 2009 states that a marine licence is required for certain activities carried out within the UK marine area. The MMO is responsible for marine licensing in English waters and for Northern Ireland offshore waters. The marine licensing team are responsible for consenting and regulating any activity that occurs “below mean high water springs” level that would require a marine licence. These activities can range from mooring private jetties to nuclear power plants and offshore windfarms.</p> <p>Please see below suggested policies from the South East Inshore Marine Plans that we feel are most relevant to your Climate Change Supplementary Planning Document. These suggested policies have been identified based on the activities and content within the document entitled above. They are provided only as a recommendation, and we would suggest your own interpretation of the South East Marine Plans is completed:</p>	
--	--	--	--	--	--

28	8	Marine Management Organisation (MMO)	General Comment	<p>These suggested policies have been identified based on the activities and content within the document entitled above. They are provided only as a recommendation, and we would suggest your own interpretation of the South East Marine Plans is completed:</p> <ul style="list-style-type: none"> • SE-CC-1: Proposals which enhance habitats that provide flood defence or carbon sequestration will be supported. Proposals that may have significant adverse impacts on habitats that provide a flood defence or carbon sequestration ecosystem service must demonstrate that they will, in order of preference: <ul style="list-style-type: none"> a) avoid b) minimise c) mitigate significant adverse impacts, or, as a last resort, d) compensate and deliver environmental net gains in line with and where required in current legislation. • SE-CC-2: Proposals in the south east marine plan area should demonstrate for the lifetime of the project that they are resilient to the impacts of climate change and coastal change. • SE-CC-3: Proposals in the south east marine plan area and adjacent marine plan areas that are likely to have significant adverse impacts on coastal change should not be supported. Proposals that may have significant adverse impacts on climate change adaptation measures outside of the proposed project area must demonstrate that they will, in order of preference: <ul style="list-style-type: none"> a) avoid b) minimise c) mitigate the significant adverse impacts upon these climate change adaptation measures. <p>We advise that you consider any relevant policies within the South East Marine Plan documents in regard to areas within the plan that may impact the marine environment.</p> <p>When reviewing the South East Marine Plan to inform decisions that may affect the marine environment, please take a whole-plan approach by considering all marine plan policies together, rather than in isolation</p> <p>Many thanks for the opportunity to comment, if you have any questions, please feel free to get in contact.</p>	<p>Comments noted. There is a section in the SPD on Ecology, Biodiversity and Green Infrastructure. This mentions the River Thames as “blue infrastructure” but without a specific reference to its role as a habitat.</p> <p>Proposed Change:</p> <p>Add the following bullet-point to the “All Development” section of KP15:</p> <ul style="list-style-type: none"> • <u>"Riverside developments should enhance river related biodiversity and avoid, minimise or mitigate significant adverse impacts."</u>
----	---	--------------------------------------	------------------------	---	---

29	8	Marine Management Organisation (MMO)	SEA Screening assessment	<p>We would agree with the Council that a full Strategic Environmental Assessment is not necessary for the draft SPD.</p> <p>I trust these comments are helpful. Please note that this opinion is based on the information provided by you and, for the avoidance of doubt, does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the SPD which is the subject to consultation. Please do not hesitate to contact me should you require any further information or would like to discuss the above. London W12</p>	Support and comments noted. No change required.
30	9	Historic England	General	<p>Thank you for consulting Historic England regarding the above draft SPD. As the Government's statutory adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is taken into account at all stages and levels of the planning process. It is important to emphasise that Historic England recognises the urgent need for positive action to tackle climate change and is committed to achieving net zero. As an organisation we have a duty of care to protect our heritage. We actively seek and promote actions that address the causes of climate change and that reduce greenhouse gas emissions. These goals are compatible.</p> <p>In fact, looking after and learning from the historic environment contributes positively to overall global sustainability and can help us adapt to and mitigate for climate change. In this sense, historic buildings can be seen to be part of the solution rather than part of the problem in the context of climate change. England has one of the oldest building stocks in the developed world and we lead the world in our ability to recycle our buildings and infrastructure, reducing unnecessary waste and carbon emissions.</p> <p>We have an internationally-renowned system for conserving our built assets, with the expertise to adapt, re-purpose and re-use our buildings for generations to come.</p> <p>Given this background, we broadly welcome the draft SPD and support the key aims it seeks to achieve as set out on page 5 and the whole building approach encouraged at para 2.1.</p>	Support and comments noted. No change required.
31	9	Historic England	Retrofitting Homes	<p>We consider the advice on the retrofitting of historic buildings to be logical and, subject to our limited comments below, appropriate to the issues and challenges it addresses.</p>	Support noted.

32	9	Historic England	Heritage and Conservation Areas page 43	<p>We consider the section entitled Heritage and Conservation Areas could be further strengthened in a number of ways. Firstly, a short section on page 43 (perhaps after the text box KP21) could be introduced to make clear that inappropriate while well-intentioned retrofit measures may not only adversely affect heritage significance but could also worsen rather than reduce carbon emissions. To help encourage users of the document to bear in mind a number of guiding principles in developing retrofit ideas for existing buildings this could make clear - The importance of ongoing maintenance as a method of both monitoring energy performance of existing buildings and ensuring its effectiveness.</p> <ul style="list-style-type: none"> - Adopting an approach that as a starting point is iterative and looks for lower cost and minimally invasive interventions - Emphasising that small scale changes, such as secondary glazing and window and door repair, can deliver significant benefits. 	<p>Comments noted, no change required.</p> <p>The document intended to guide a range of applicants in how best interventions can be made to adapt to and mitigate the effects of climate change. It is expected that applicants will undertake their own research alongside the recommendations contained in this document to assess fully what interventions are most appropriate for their property.</p> <p>It should be noted that this document is not an advice guide, but instead a planning document and therefore smaller changes that can be made and advice that is not relevant to planning (such as regular maintenance) are not included in the document. The Council is putting together a webpage which will include links to best practice on a wider range of topics including general maintenance and repair. This will include links to Historic England Guidance where appropriate.</p>
33	9	Historic England	Heritage and Conservation Areas Table 1; and diagram p11	<p>Secondly, in relation to Table 1 and replacement and/repair of windows, we would suggest that it be made clear that uPVC windows have no carbon pay-back with the result that the benefits of energy saved through installation does not cover the carbon cost of manufacture relative to their shorter life-span.</p> <p>We would also suggest that relevant Historic England guidance and advice is signposted at an appropriate point in the document – for further details please see Retrofit and Energy Efficiency in Historic Buildings Historic England. https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/</p> <p>In relation to the diagram on page 11, it would be helpful if it were to be made clear that repair of windows in buildings in conservation areas should be considered wherever possible before replacement is carried out.</p>	<p>The Council promotes the use of sustainable materials where possible and this is explicitly encouraged in the embodied carbon chapter of the document. The Council is putting together a webpage which will include links to best practice on a wider range of topics including general maintenance and repair. This will include links to Historic England's Guidance where appropriate.</p> <p>Page 11 diagram comments noted.</p> <p>Proposed change:</p> <p><u>Where repair of existing windows is unfeasible</u> high-performance windows should be installed. These should be either double or triple glazed. In conservation areas, these new windows should seek to replicate existing styles.</p>

34	10	CPRE London	General comment/support	<p>CPRE London is a membership-based charity with 2,500 members across London concerned with saving London's precious, protected Green Belt and Metropolitan Open Land and its local parks and green spaces, as well as making London a greener city and a better place to live for everyone.</p> <p>We strongly support the aims and the content of this document though we believe it should be strengthened by removing equivocal statements.</p>	<p>Support and comments noted. The language and statements used are explained in the 'How to use the SPD' section of the SPD. The SPD cannot introduce new policy or requirements over and above the adopted development plan which dictates how the key principles can be worded. This is why there are Must Do principles and Can Do principles.</p>
35	10	CPRE London	Ventilation and Overheating, KP3	<p>Some aspects need to be strengthened by removing the words 'where possible' or 'if possible' or 'consider' etc. Developers prefer a clear statement and are likely to ignore a policy if it is not clear they must adhere to it. It is such an important document we feel it is worth aiming to remove equivocal statements wherever possible. An example in KP3:</p> <p>"For new developments, provide dual aspect dwellings where possible as this can help provide cross-ventilation via openable windows which can help control internal temperatures.</p> <ul style="list-style-type: none"> • Avoid single aspect dwellings if possible as these are more difficult to ventilate and keep cool using natural, passive measures and therefore more likely to overheat. • Consider minimising the glazing ratio to reduce the risk of overheating • Design out the need to include active air conditioning systems and minimise their use 	<p>Comments noted. KP3 highlights measures than "Can" be included, not "Must" be included - i.e., they relate to measures that are encouraged and promoted rather than measures required by policy.</p> <p>With regards to the dual/single aspect and glazing ratio related comments – neither the London Plan nor the H&F Local Plan has a policy that bans the use of single aspect dwellings, so we cannot say these must be avoided in the SPD. The London Plan recognises that high proportions of glazing can increase overheating risks but accepts that these can be mitigated through other measures. We have highlighted the use of passive measures to prevent overheating in KP4 and KP5.</p> <p>Proposed Change:</p> <p>KP3: Amend wording in the bullet-point on single aspect dwellings:</p> <ul style="list-style-type: none"> • "Avoid Single aspect dwellings should normally be avoided if possible as these are more difficult to ventilate and keep cool using natural, passive measures and therefore more likely to overheat"

36	10	CPRE London	Transport and movement, KP11	<p>KP11 1. this should explicitly reference the role public kerbside space will need to play in delivering 'high-quality public realm' [we note this is referenced to an extent in KP12 but believe specific mention is needed in KP11]</p> <p>2. This statement under KP11 page 31 should be clarified: "Ensure that any impacts on London's transport networks and supporting infrastructure are mitigated." - could be edited to read 'any negative impacts on London's transport networks should be mitigated" perhaps clarifying what 'negative' would entail).</p>	<p>Competing demands on kerbside space mean that in practice a balance will need to be struck taking into account operational requirements and site specific priorities - i.e. be reallocated to deliver other objectives such as footway widening or tree planting. Specific technical guidance on the kerbside space is already set out in Transport for London's Streetscape guidance.</p> <p>No change required.</p> <p>KP11 references to Manual for Streets and Healthy Streets. The wording reflects London Plan policy T1. Site specific circumstances determine what mitigation is achievable – mitigation may not be possible on all sites.</p> <p>No change required.</p>
----	----	-------------	-------------------------------------	--	--

37	11	Swifts Local Network	General, and holding reply	<p>I would like to comment on the Climate Change SPD consultation, on behalf of the Swifts Local Network. I am only just in time as I misunderstood the scope of this document, so I will submit my comments in a few parts today to make sure I submit at least something in time.</p> <p>Comments on Consultation Page The consultation page Have Your Say states: "Have your say: How new developments must help us combat climate change" then further once you open the link: "The new planning guides will offer support to developers... and other interested parties when preparing and assessing planning applications, ensuring that new homes and developments are more friendly to the environment." I read the above and assumed it was related to new-build developments' impact on climate change - important but not of particular interest to me. I therefore made the mistake of reading no further.</p> <p>The organisation I represent aims to protect endangered building-based biodiversity such as bats, swifts, and sparrows, impacted by work on existing buildings such as retrofit for energy efficiency. I have just been informed, and I see is correct now I read further on and the document itself, that this is in fact extremely relevant to this SPD. My mistake for not reading to the end of the summary but I feel that this could have been clearer and that is why these comments are now rather in a rush.</p>	Comments noted. The introduction of the SPD is clear on its purpose. The document is to guide planners and applicants in preparing and assessing planning applications.
38	11	Swifts Local Network	Ecology, Biodiversity and Green Infrastructure/ Retrofitting Homes	<p>I see that biodiversity is covered by this document, but the main impact of retrofit for energy-efficiency is the aforementioned loss of nest and roost sites for buildings-based biodiversity such as bats, and now red-listed urban birds such as swifts, and house sparrows, due to building work undertaken without consideration of their potential presence. However, I cannot find this mentioned anyway in the document. Even the existence of buildings-based biodiversity and as a minimum the legal implications of undertaking work which may affect it is not mentioned - unless I have missed it? I will reply later in more detail on this.</p>	Comments noted. This document should be read alongside other planning documents which contain wider guidance on biodiversity. For example, our Planning Guidance SPD.

39	11	Swifts Local Network	General (content)	<p>Title of Document</p> <p>I find that this document being entitled a "Climate Change SPD" is significantly misleading as many of the subjects covered are not relevant to climate change. Brent recently consulted on a very similar document and gave it what I consider a more accurate title of "Sustainable Environment and Development SPD". Westminster called their similar document an "Environmental SPD".</p> <p>I speak from a position of some knowledge, as I have been a sustainable buildings consultant for over 20 years and also have an environmental masters degree.</p> <p>Air quality for example is an important local environmental issue, but it is not related to climate change - except that better air quality can actually make climate change worse due to a reduced albedo effect. So either this document should be renamed or air quality should not be in it.</p> <p>Similarly: water use, transport, biodiversity, flooding, and waste, are all important environmental issues but have a complex relationship with climate change - recycling for example is important to reduce waste to limited landfill availability but its impact on climate change would need a holistic assessment to know whether the overall impact is positive. Greywater is promoted in the water section but this consumes energy and so potentially adds to climate change, depending on circumstances.</p> <p>Therefore an "Environmental SPD" or similar seems a much more appropriate title.</p> <p>I am concerned to see detailed biodiversity recommendations in here, as speaking for myself I would not look for them in a document entitled a Climate Change SPD.</p> <p>I am hoping that this is not going to be the main source of biodiversity policy for the borough going forward and there will be a clear separate biodiversity policy document being produced, but it seems potentially confusing to have guidance on the same subject in different documents. Further comments to follow.</p>	<p>Comments noted. Many of the topic areas addressed in the SPD are cross cutting and therefore there are references in different planning documents to them. For example, Biodiversity and air quality are both addressed in our planning guidance SPD. This Climate Change SPD has been prepared to gather the most relevant climate change policy and guidance in one place for those looking to retrofit or develop in the borough. It must be read alongside our other planning documents when preparing planning applications.</p>
----	----	----------------------	--------------------------	---	--

40	11	Swifts Local Network	Ecology, Biodiversity and Green Infrastructure	<p>Here are comments regarding the Ecology, Biodiversity and Green Infrastructure section of draft Climate Change SPD, pages 35-37. As previously mentioned, I think this document should be renamed as "Environmental SPD" or similar as I would not be looking for a biodiversity section in a Climate Change SPD (measures such as bird boxes for example are important for biodiversity but have no relevance to climate change), and I think this section will get missed under the current document title.</p> <p>There is a small but significant error I believe in paragraph 2.4.8 (page 35), as it's incorrect to say the London Plan (2021) follows the Biodiversity Net Gain (BNG) policy approach - whilst BNG is mentioned in 8.6.6. of the London Plan that just provides a definition.</p> <p>G5 Urban Greening and G6 Biodiversity set out the London Plan's approach to biodiversity.</p> <p>Of course net gain will be a legal requirement as for the rest of the UK under the Environment Act. London Plan Policy G5 is referenced in this SPD but not G6, which is inconsistent as G6 is equally important to this section - therefore please also reference G6.</p> <p>In summary, please include vital "species features" such as swift bricks, bat boxes, and hedgehog highways, implemented in accordance with best practice guidance such as BS42021:2022, as an integral part of the biodiversity policy.</p> <p>In particular the London Plan 2021 policy G6 (item B4) calls for artificial nest sites appropriate for an urban context [e.g. swift bricks], and this is not currently referenced except a passing advisory references to "bird boxes" without further guidance:</p> <p>https://www.london.gov.uk/programmes-strategies/planning/london-plan/new-london-plan/london-plan-2021 Also consider existing populations of fauna, especially those which are dependent on buildings to nest and roost and so are overlooked by the biodiversity net gain metric.</p> <p>In more detail, green and blue infrastructure, the biodiversity net gain (BNG) metric, and the Urban Greening Factor, as currently referenced in this section, are worthwhile but only consider green and blue habitats and are not a holistic consideration of biodiversity.</p>	<p>The purpose of this SPD is to set out how development requiring planning permission can respond to climate change in the context of local and London Plan policy. The SPD encourages best practice for householders and businesses in the borough looking to undertake development projects including retrofitting property. The London Plan, the council's Local Plan and Planning Guidance SPD set out policy and key principles on a wide range of environmental matters including biodiversity. The title of this document is therefore considered appropriate.</p> <p>No change required.</p> <p>It is outside the scope of this supplementary planning document to provide detailed information on habitats and habitat creation, however in the context of building projects there is merit in reference bat and bird boxes:</p> <p>ADD to last sentence paragraph 2.44: <u>Residential gardens, buildings and other structures can also support important habitats for flora and fauna, such as roofs or eaves for bats and birds and gaps/ holes for insects eg. Bee bricks. It is important to note that studies are still underway on the effectiveness of Bee bricks, and we'll update our website as we get further clarity.</u></p> <p>Guidance on biodiversity including birds and nests is already provided in the adopted Planning Guidance SPD (para16.52).</p> <p>The purpose of London Plan Policy G6 is to direct on the content of London boroughs' development plan policy rather than influence the assessment of development proposals.</p> <p>No change required.</p>
----	----	----------------------	---	--	--

			<p>These ignore existing populations of fauna, especially those which are dependent on buildings to nest and roost such as bats, Common Swift and House Sparrow.</p> <p>These also ignore the features necessary for wildlife to use immature habitats, fundamentally places to nest and roost, and routes from one areas of habitat to another.</p> <p>These can be summarised as swift bricks, bat boxes and hedgehog highways (the benefits of which are stated in National Planning Policy Guidance 2019 Natural Environment paragraph 023 - https://www.gov.uk/guidance/natural-environment).</p> <p>There is a general reference to bird and bat boxes which is positive, but without guidance these can be of little value, e.g. an inadequate number of poorly located timber boxes for non-target species (which is pretty typical of developer's efforts!) is a short term and ineffective measure.</p> <p>Although hedgehogs are not currently widespread in the borough they may be in the future if habitat is provided. The latest government BNG biodiversity metric consultation response dated March 2023 (https://consult.defra.gov.uk/defra-net-gain-consultation-team/technicalconsultation_biodiversitymetric) refers to "species features" such as swift bricks and bat boxes being referenced in the Biodiversity Net Gain information so that local authorities can include planning conditions for these, but local authorities will need relevant local policy to enable them to set these conditions.</p> <p>Swift bricks are considered a universal nest brick for small bird species - NHBC Foundation report "Biodiversity in new housing developments: creating wildlife friendly communities" (April 2021) states:</p> <p>"Provision of integral nest sites for swifts is through hollow chambers fitted into the fabric of a building while in construction [i.e. swift bricks]. Although targeting swifts they will also be used by house sparrows, tits and starlings so are considered a 'universal brick'" (section 8.1 Nest sites for birds, page 42).</p>	
--	--	--	--	--

https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-innew-housing-developments_FINAL.pdf

These small bird species include many which are red-listed in the UK and currently seen in Hammersmith & Fulham such as Common Swift, House Sparrow, House Martin, and Starling.

Integrated swift bricks are much better than external nest boxes as they are a permanent feature of the building, zero maintenance, aesthetically integrated with the design of the building, and have better thermal regulation with future climate change in mind.

The UK Green Building Council (UKGBC) is a membership-led industry network and they have produced a document entitled: "The Nature Recovery & Climate Resilience Playbook" (Version 1.0, November 2022)

<https://ukgbc.org/resources/the-nature-recovery-and-climate-resilience-playbook/>

This document is designed to empower local authorities and planning officers to enhance climate resilience and better protect nature across their local area.

This document includes a recommendation (page 77) which reflects guidance throughout this document: "Recommendation: Local planning Authorities should introduce standard planning conditions and policies to deliver low cost/no regret biodiversity enhancement measures in new development as appropriate, such as bee bricks, swift boxes and hedgehog highways."

They highlight examples such as Cornwall and Brighton which have implemented best practice policies (page 76). Many other local planning authorities have fully adopted similar policies such as Plymouth & SW Devon, Dartmoor, Broxbourne, and the London Borough of Bexley, with many more at earlier stages of the adoption process.

Unfortunately, however, this UKGBC recommendation and NPPG 2019 Natural Environment paragraph 023 have been overlooked by some local authorities in England which are too often focusing solely

			<p>on green/ blue infrastructure and the biodiversity net gain metric rather than a holistic approach.</p> <p>Best practice guidance for swift bricks is available for example from CIEEM (https://cieem.net/resource/the-swift-a-bird-you-need-to-help/), and BS 42021:2022 (https://standardsdevelopment.bsigroup.com/projects/2017-03102), both recommending at least one swift brick per dwelling on average for a typical low-rise residential development (and all integral bricks to be the swift brick type which all small bird species may safely use).</p> <p>The Mayor of London's guide to Urban Greening for Biodiversity Net Gain calls for integrated nest bricks but it is easily missed on the final page of the document:</p> <p>https://www.london.gov.uk/programmes-strategies/urban-greening-biodiversity-net-gain-design-guide</p> <p>Note that this document specifically references integrated nest bricks, not external bird boxes.</p> <p>The London Plan policy G6 (item B4) calls for artificial nest sites appropriate for an urban context [e.g. swift bricks], and this is not currently referenced except passing advisory references to "bird boxes" without further guidance:</p> <p>https://www.london.gov.uk/programmes-strategies/planning/london-plan/new-london-plan/london-plan-2021</p> <p>I hope in conclusion that you will include vital "species features" such as swift bricks, bat boxes, and hedgehog highways, implemented in accordance with best practice guidance such as BS 42021:2022, as an integral part of the biodiversity policy, and consider existing populations of fauna, especially those which are dependent on buildings to nest and roost and so are overlooked by the biodiversity net gain metric.</p> <p>Further comments to follow regarding guidance for minimising the impact of energy-efficiency retrofit measures on buildings-based biodiversity.</p>	
--	--	--	---	--

41	11	Swifts Local Network	Retrofitting Homes	<p>These relate to the impact of energy-efficiency retrofit on buildings-based biodiversity such as bats and red-listed bird species such as Common Swift, House Sparrow, and Starling. This would be expected to be covered in the sections on Retrofitting Homes (pages 11, 15 & 53) but I cannot see it currently referenced. In summary, please highlight this issue, the potential implications including legal implications (The Wildlife and Countryside Act 1981 protects bat roosts and active bird nesting sites), and potential positive opportunities for integral nest and roost sites.</p> <p>There are two easy sources of reference for this subject, "Camden Planning Guidance: Home Improvements" (January 2021) and the Swifts Local Network's "External Wall Insulation: An Opportunity to Boost Biodiversity" (April 2022).</p> <p>In more detail, there is unfortunately a national lack of guidance on this subject but one existing source is the "Camden Planning Guidance: Home Improvements" (January 2021) document as this is well written and covers most relevant points, see in particular the Wildlife section (pages 28-29).</p> <p>https://www.camden.gov.uk/planning-policy-documents</p> <p>External Wall Insulation (EWI) in particular can significantly affect buildings-based biodiversity as it will seal off any entrance holes between the wall and the roof, so the potential presence of biodiversity should be assessed, legal compliance ensured, and mitigation undertaken where relevant.</p> <p>The Swifts Local Network have produced a document "External Wall Insulation: An Opportunity to Boost Biodiversity" (April 2022), focusing on the positive opportunity from such work to provide integrated nest spaces for swifts and other cavity-nesting small bird species such as house sparrows.</p> <p>Here is a link to the document, and I will also email as an attachment but separately in case it may be blocked for any reason (it is just a 1.5 MB PDF but just to be on the safe side):</p> <p>https://drive.google.com/file/d/1JtsXiYq5YGXbx8s0G_Ln14LUg2f7ZV7r/view?usp=drive_link</p> <p>Also the following three paragraphs are just to provide background</p>	<p>The purpose of this SPD is to set out how development requiring planning permission can respond to climate change in the context of local and London Plan policy as well as encourage best practice for householders and businesses in the borough looking undertake development projects including retrofitting property. The London Plan, the council's Local Plan and Planning Guidance SPD set out policy and key principles on a wide range of environmental matters including biodiversity. No change proposed to the title of this document.</p> <p>It is outside the scope of this SPD to provide detailed information on habitats and habitat creation, however in the context of building projects there is merit in reference bat and bird boxes.</p> <p>Proposed change:</p> <p>Diagrams on pages 11-15 to show habitat creation in an urban environment, especially the importance of bat and bird boxes.</p> <p>The Council is putting together a webpage which will include links to best practice on a wider range of topics including general maintenance and repair. This will include links to best practice guidance regarding habitat creation where appropriate.</p>
----	----	----------------------	---------------------------	--	---

				<p>information to demonstrate the need for this guidance: With greater awareness of swifts in particular, it is becoming increasingly common for council building works to be halted due to their impact on breeding birds e.g. this incident from 2022 in Sheffield:</p> <p>https://www.theguardian.com/environment/2022/jul/15/room-at-the-top-woman-races-to-help-swifts-blocked-from-sheffield-roofs?utm_source=dvr.it&utm_medium=twitter</p> <p>Also see this article by author Hannah Bourne-Taylor for Middlemarch Environmental ecologists, which has some factual inaccuracies but demonstrates the profile that this issue is obtaining now: https://www.middlemarch.eco/join-the-campaign-to-safeguard-cavity-nesting-birds/</p>	
--	--	--	--	---	--

42	11	Swifts Local Network	Retrofitting Homes (continued)	<p>Here are my final comments with regard to the Climate Change CPD. Following my previous email (comments part 3) I have attached the Swifts Local Network document: "External Wall Insulation: An Opportunity to Boost Biodiversity" (April 2022). as a PDF file for reference.</p> <p>Although the presence of swifts is not necessarily relevant, as the comments similarly apply to the more widespread but also red-listed house sparrow, an indication of a significant but currently declining presence of swifts throughout Hammersmith & Fulham can be found on the RSPB Swift Mapper website where members of the public have entered records: https://www.swiftmapper.org.uk/</p> <p>Swifts are strongly faithful to their nest site and will return to exactly the same nest site each summer.</p>	Comments noted, not change required. Please see earlier responses.
----	----	----------------------	---------------------------------------	--	--

43	12	Alison Hancock	General	<p>As a householder who is currently engaged in seeking to retrofit my house, I did find aspects of this SPD document useful and it covered some areas such as biodiversity, which I had personally not given enough consideration to in my plans.</p> <p>The challenges in seeking to retrofit old houses are considerable and expensive. If the council is to achieve its ambitious climate change objectives, the retrofitting of the boroughs aging housing stock is critical, given that these will still constitute most of the housing stock in 2030. I believe that the council will need to work more collaboratively with residents, as it can only achieve its ambitious climate change objectives with the support and self-financing by local residents. As a householder I have faced the following challenges:</p> <ol style="list-style-type: none"> 1. Planning 2. Objective information and advice 3. Finding installers 4. Financing <p>I believe that the council has a key role in removing/reducing the barriers/challenges in the first 2 and this SPD document is a start at least in the right direction. That said I do not believe this document is sufficient to guide a householder through the onerous planning process in H&F for environmental/green initiatives. I think that there is far more that the council should do to support residents on this journey.</p> <p>The SPD focusses solely on what others should do and not what the council will do to help, this is particularly relevant for homeowners seeking to retrofit, who do not have the luxury of planning consultants to support them. Much of the focus of the SPD is on new developments yet these will only represent a small proportion of housing stock. In my opinion there needs to be greater focus on retrofitting in this document and far more support than is currently available.</p> <p>The free planning support offered to residents is not preplanning it is merely the opportunity to ask the duty officer a question.</p> <p>1 Planning Despite what it states in this document, to implement many of retrofit measures under current planning rules will require householders to go to planning. Costs of planning (architectural drawings, planning fee,</p>	<p>Comments noted.</p> <p>No change required.</p> <p>It is outside the scope of this Supplementary Planning Document to provide information regarding non-planning matters such as objective advice, installation and finance. The SPD is focussed on a range of applicant types including homeowners and developers and thus accounts for a range of different development types, including new builds.</p> <p>The Council is unable to influence the statutory planning process as this is outside of the control of the Council. For example, permitted development rights and planning application fees are set centrally by the Government at a national level. There are several resources available to guide homeowners through the planning process including the planning portal (https://www.planningportal.co.uk/) which includes a helpful 'Do I need permission section' for homeowners. The Council is putting together a webpage which will include links to best practice on a wider range of topics including general maintenance and repair. This will include links to best practice guidance and helpful links regarding the planning process and the pre-application advice service.</p> <p>The Council are unable to comment on individual planning applications.</p>
----	----	----------------	----------------	--	--

				<p>etc.) are considerable and a barrier for many to consider embarking on many retrofitting measures.</p> <p>a. Solar – The majority of terrace houses have loft extensions. The obvious place for solar installations in these circumstances are the flat roofs, where the roof space is larger, and panels will be barely visible. Panels on a flat roof need to be placed on a racking system, there is currently no racking system that would meet the permitted development rights of 20cm on a flat roof. With a racking system the panels will be approximately 30cm from the roof line. Hence residents with flat roofs will need to go to planning.</p> <p>b. Heat Pump – The majority of the housing stock is very old and it is likely that the heat losses will require a double fan heat pump. A dual fan heat pump would not meet permitted development rules which state that heat pump must be below 0.6 cubic meters, hence for many planning will be required for the installation of a heat pump.</p> <p>In my case I did go to planning on 2 separate occasions for solar (2x), heat pump (1x) and triple glazing (2x). I had expected the council given its stated views on climate change to have been supportive of my proposals, which unfortunately was not my personal experience with all 3 of my initiatives being challenged. I have spent a considerable sum of money seeking to satisfy the council's planning process. I think that the council could do far more to help residents in this process, I have listed some examples below.</p> <p>a. Provide guidance on nature of drawings and level of detail required to satisfy H&F planning b. Only ask for drawings and details needed to make an informed decision c. Speed up the process</p> <p>2 Objective information and advice The council states that it offers free pre-planning advice for retrofit measures. Based on my experience this allows a householder to ask the duty officer a question and, in my case, they did get back to me very promptly on my specific question, but I was also told if I wanted more general preplanning retrofitting advice, I would have to pay for it. One of the biggest issues that anyone embarking on a retrofit journey is one of trust.</p>	
--	--	--	--	---	--

			<p>There is a lot of conflicting information. This lack of trust is confounded by current onslaught and myths/rubbish spouted by far-right politicians and right-wing press regarding heat pumps. This only serves to hinder the uptake of heat pumps in the UK, with the UK currently is 2nd bottom for heat pump installations in the UK only beaten by Hungary.</p> <p>One of the best sources of information I gained was at an open house event of a local resident. People are more likely to trust people other local residents and people they know.</p> <p>Below are other examples I believe that the council could consider:</p> <ul style="list-style-type: none">. 2. Learn from other residents who have installed retrofit measures3. Monitor performance of heat pump/solar installations in the borough	
--	--	--	---	--

44	12	Alison Hancock	Low Carbon Heating and Renewable Energy, KP7	<p>I believe that the planning process with H&F is one of the key contributing factors resulting in H&F having one of the lowest solar penetrations in the UK and given the UK has one of the lowest penetrations in Europe.</p> <p>Currently across the 2 Parliamentary constituencies there were less than 7 solar installations a month (Exhibit 1) for Jan-March 2023. Given that H&F is an affluent area, solar prices have plummeted and increased energy costs have all contributed to a much-improved business case for solar, cost is unlikely to be the barrier to installations in H&F. Figurers are not available for heat pump installations but given the complexities of installations and the significantly higher installation costs the numbers will be even lower. These figures are truly shocking and would suggest unless urgent action is taken by the council, its Climate Change objectives are merely a pipe dream.</p> <p>Exhibit: 1 – Solar installations in 2 Parliamentary seats in H&F</p>	<p>Comments noted. The council’s planning polices and associated guidance, including this SPD support the inclusion of renewable energy generation on new developments in the borough, especially major schemes. The most common installations are Heat Pumps and solar PV panels.</p> <p>The council also promotes schemes such as “Solar Together” and provides free pre-planning advice to residents interested in getting solar panels installed. In certain circumstances, installing renewables can be permitted development and be carried out without the need for planning permission.</p> <p>No changes required.</p>
----	----	----------------	---	--	--

45	12	Alison Hancock	Retrofitting Homes	<p>1.a. Planning and Conservation area In the SPD the document states “Conservation Areas where planning permission is required to apply retrofit measures to buildings in Conservation Areas, the Council will only grant permission if the proposed development would preserve or enhance the character and appearance of the area or if the public benefits of the proposal outweigh any harm to its significance and that there is a mechanism in place to secure the delivery of the public benefits”.</p> <p>More than 50% of properties are within a Conservation area, this statement effectively gives the council planning department carte blanche to reject any retrofit proposal in a Conservation area. The SPD gives no guidance on any of following:</p> <ol style="list-style-type: none"> 1. What public benefits may be considered acceptable by H&F – surely climate change is sufficient? 2. What examples can the council provide of the mechanisms that need to be in place? <p>I appreciate that the council must balance the preservation versus conservation needs. I believe a balance can be struck but it requires pragmatism from the planning department.</p> <p>The SPD document needs to give greater clarity on this statements and practical examples of 1 and 2 that they would expect to see.</p> <p>Above are just a few examples of how both H&F planning department and council could be more supportive of local residents wanting to retrofit their houses, I have many more.</p> <p>The focus of my response to the SPD consultation has been on retrofitting, which I believe for the reasons highlighted above needs more detail on H&F expectations should planning be required for it to be of greater value. The most worrying aspects of the SPD regard the statements made with respect to Conservation areas and I believe that the council needs to give greater clarity on this, especially given that more than 50% of H&F properties are within a Conservation area. I believe with pragmatism on behalf of the planning department a balance can be struck between preservation and conservation.</p>	<p>Comments noted. National Planning Policy constrains actions that can be taken in Conservation Areas through permitted development. The Council is unable to adjust these constraints as these are set nationally by the Government. The Council encourages upgrades to property in Conservation Areas while ensuring that the is respectful of heritage in the borough.</p> <p>Conservation Area boundaries are reviewed based on the contribution they make to heritage in the borough. These boundaries will be reassessed as part of the next Local Plan review.</p>
----	----	----------------	---------------------------	--	--

46	12	Alison Hancock	Case Studies	<p>Below are other examples I believe that the council could consider:</p> <p>1. Case studies – All case studies in this document are from other areas, why are there no H&F resident case studies.</p>	Comments noted. The case studies section has been amended to focus on local examples.
47	12	Alison Hancock	New Homes/Non-Domestic Buildings	<p>In response to matters that concern new buildings I do not think that the document goes far enough. It is appalling given the evidence on Climate Change that it is not mandatory that all new buildings are installed with a heat pump and solar power. I believe that the SPD should make the installation of heat pumps and solar mandatory irrespective of the size of the development unless technically unfeasible.</p>	<p>Comments noted. The SPD cannot set new policy such as making it mandatory and requiring all new buildings to install heat pumps and/or solar panels.</p> <p>The council's planning policies already require major schemes to achieve net zero carbon and Energy Strategies typically include renewable energy generation such as heat pumps and solar PV panels. We encourage smaller schemes to include renewables and some do this, but we cannot require this.</p> <p>Residents may also be able to install renewables through the permitted development route subject to meeting certain requirements.</p> <p>No change required.</p>

48	13	ECDC (Earls Court Development Company)	General	<p>Thank you for providing us with the opportunity to comment on the London Borough of Hammersmith and Fulham’s Draft Climate Change Supplementary Planning Document (SPD) which is out for consultation. These representations have been prepared by the Earls Court Development Company (‘ECDC’) with input from Hoare Lea and Hawkins Brown/Studio Egret West on behalf of the Earls Court Partnership Limited (‘ECLP’).</p> <p>ECDC welcome the opportunity to continue to contribute to the evolution and preparation of the SPD which aligns with one of our four key priorities for the Site:</p> <p>“Addressing the climate emergency: An ambition to go beyond net-zero”</p> <p>The representations hereby enclosed relate to the former Earls Court Exhibition Centres (the ‘Site’) and are made by the ECDC on behalf of the landowner the Earls Court Partnership Limited (‘ECPL’). ECPL is a joint venture between Transport for London (‘TfL’) and Earls Court (London) LLP (‘ECP’) (a joint venture between Delancey’s client funds DV4 and APG. ECDC is the Business Manager responsible for the delivery of the Earls Court redevelopment project and has been established as a locally based business.</p> <p>The SPD sets out key principles which seek to address the climate change emergency. These key principles are separated into what must be done, and what can be done (Figure 1). We are supportive of this SPD, however we have some more detailed comments and suggested amendments in the schedule below and request that you consider these.</p>	Comments noted
----	----	--	----------------	--	----------------

49	13	ECDC (Earls Court Development Company)	<p>Net Zero Buildings, para 2.5 (First sentence)</p>	<p>This paragraph is not defined as a ‘must’ or ‘can’ key principle, but the wording suggests that it has to be achieved. Is the numbered text that accompanies the key principles only contextual? Paragraph 2.5 seems to state what major new developments are expected to achieve. Are the LETI KPIs outlined expected to be achieved on all developments? Or are they ambitions to strive for? The applicant can and will provide design outcomes in the same format, i.e. kWh/m² and kgCO₂/m². However, achieving these target may not be technically feasible for the development.</p> <p>Query to LBHF or proposed amendment: If the KPI performance is expected to be met, it is recommended they are added to a key principle box and LBHF provide an evidence base that these are technically feasible.</p>	<p>Comments Noted. There are no Net Zero Carbon Buildings KPs for “Must do” and “Can do”. This is also the case for the preceding section on “Retrofitting your Property”.</p> <p>Proposed change:</p> <p>Add a new “Can Do” text box to this section. Note, this will affect the “Key Principle” numbering for the rest of the document.</p> <p><u>KP1 Key Principles – What you CAN Do</u></p> <ul style="list-style-type: none"> • <u>Achieve the LETI standards for space heating demand</u> • <u>Meet the LETI Energy Use Intensity standards</u> • <u>Balance the EUI for the site or achieve 120 kWh/m²/yr of renewable energy generation</u> • <u>Reduce the embodied carbon to LETI standards</u> <p>Proposed change:</p> <p>Also, amend Para 2.5 as follows:</p> <p>”New major developments in the borough must <u>should seek to</u> achieve Net Zero carbon in operation. <u>This can be done by following the Energy Hierarchy (Figure 5). Additional improvements can be achieved</u> through applying the three core principles outlined below, and by demonstrating the Key Performance Indicators (KPIs) defined by LETI and reproduced on the right. Similarly high levels of performance are also encouraged for smaller developments.</p>
----	----	--	---	---	---

50	13	ECDC (Earls Court Development Company)	Net Zero Buildings, para 2.5 Renewable Energy Generation 4th Bullet	<p>The paragraph states that this a recommendation, so it is assumed that while it should be an ambition of a development, it won't form a rigid material consideration in a planning application. To achieve an energy balance on site, development density would need to be closer to 2-3 storeys. For a development of this density this is unachievable and therefore not technically feasible. The 120kWh/m² is a secondary metric which is more technically achievable, however very challenging.</p> <p>Query to LBHF or proposed amendment : It is unclear where the 120kWh/m² footprint benchmark is from and a reference is needed.</p>	<p>Comment Noted. Agreed that the wording needs revising slightly because it currently reads as a requirement to meet the 120kWh/m²/yr target whereas this is more of a target that developments should seek to achieve (which is how it is referred to in the table adjacent to this text, Figure 3).</p> <p>Proposed Change:</p> <p>Revise “Renewable Energy Generation” bullet-point in Para 2.5:</p> <p>“In new buildings, it is recommended that annual renewable energy generation should be at least equal to the energy use of the building (the EUI). If this is not possible on-site, it should be demonstrated that the development should seek to achieve generation of the equivalent of 120 kWh/m²/yr footprint/yr of renewable energy is generated across the development”.</p>
51	13	ECDC (Earls Court Development Company)	Net Zero Buildings Figure 3	<p>As per comments above, are the LETI targets a guide or an obligation?</p> <p>Query to LBHF or proposed amendment: As per comment on para 2.5</p>	<p>Comment Noted. The heading of Figure 3 is “New developments should seek to achieve the KPIs recommended by LETI” - i.e. they are not a requirement.</p> <p>No change proposed to Figure 3 but as noted above, we will revise the text in Para 2.5 to be consistent with Figure 3.</p>
52	13	ECDC (Earls Court Development Company)	Building Form and Fabric, para 2.6	<p>All developments should seek to achieve a net zero energy balance on-site. Optimising building form can make it easier and cheaper to achieve this target. Where the text states, a development “should seek to achieve net zero energy balance”, what evidence is required to demonstrate this? Is a net zero energy balance on site compulsory, or a stretch ambition to aim for? Query to LBHF or proposed amendment: Would LBHF be open to the consideration of heat pumps for the ambient heat network, as a contribution or consideration of on-site renewable generation?</p>	<p>Comments noted. The achievement of “net zero energy balance” is not a compulsory requirement. We would suggest that calculations could be provided to show that the total amount of energy used on average each year by a development is at least equal to the amount of renewable energy generated locally on the site. We would expect Heat Pumps would qualify as renewables for this purpose.</p>

					<p>Proposed change:</p> <p>Amend the first line of Para 2,6 to read: "All developments should seek aim to achieve a net zero energy balance on-site".</p>
53	13	ECDC (Earls Court Development Company)	<p>Site and Orientation, KP2</p> <p>These are very specific requirements and more appropriate for single blocks. A large masterplan like EC will have to respond to many masterplanning and spatial issues, especially site infrastructure constraints on layouts.</p> <p>On dense sites, particularly applicable to Earls Court where its designation as an Opportunity Area recommends the site for high density development, the proposed spacing between buildings would not be feasible.</p> <p>Also, the balance between internal solar gains and overheating needs to always be considered, due to the requirements of Part O. Query to LBHF or proposed amendment: The addition of the words 'where possible' would be welcome given the site's complexities.</p>	<p>Comments noted.</p> <p>The green box in the document is for things developers can do rather than must do. This format for the key principles is explained in the introduction of the SPD.</p> <p>However, for further clarity with the wording we accept the suggestion of adding "where possible" to the key principles box on page 19.</p> <p>Proposed change:</p> <p>KP2 - 'Allow a distance of 1 to 1.5 times the buildings height between buildings to avoid overshadowing and impacting the internal solar gains, where possible'</p>	
54	13	ECDC (Earls Court Development Company)	<p>Ventilation and Overheating, KP3 bullets 2-7</p> <p>It is noted that Passivhaus standards are suggested here as a guide, rather than a compulsory standard.</p> <p>It is not clear what LBHF will expect to see to demonstrate that Passivhaus principles have been followed.</p> <p>Query to LBHF or proposed amendment: The Passivhaus principles are far reaching and it would be hard to demonstrate that they have been followed.</p> <p>If the applicant uses PHPP (Passivhaus Planning Package) to model energy performance would LBHF consider this a demonstrable way to show that Passivhaus principles have been followed?</p>	<p>[PB] Comment noted. We have not set any requirements in relation to demonstrating how Passivhaus standards have been implemented.</p> <p>The Passivhaus Planning Package (PHPP) has been developed by the Passivhaus Institute to model and demonstrate a building's operational energy use and carbon emissions so this would be an acceptable method to use.</p> <p>No change required.</p>	

55	13	ECDC (Earls Court Development Company)	Ventilation and Overheating, KP5	<p>Overheating modelling will be undertaken and the risk through passive measures will look to be minimised. However it is expected that some form of cooling will be required in many apartments to meet Building Regulations Part O requirements. It is not clear what is meant by “insulation which can prevent heat retention”. This is the purpose of insulation, so clarification will be needed.</p> <p>Query to LBHF or proposed amendment: Overheating modelling will be undertaken and the risk through passive measures will look to be minimised. However, it is expected that some form of cooling will be required in many apartments to meet Building Regulations Part O requirements, considering window opening coordinated with excessive external noise.</p> <p>Where the text states that air conditioning systems should be minimised, how would LBHF want the applicant to demonstrate this? If the apartments were to show limited overheating risk with windows fully openable, would this be an acceptable approach?</p> <p>Additionally, it is unclear what LBHF are referring to, with “insulation which can prevent heat retention”. This is the purpose of insulation, so can LBHF please clarify this point?</p> <p>Or change to “use of high insulation levels to limit heat transfer in on hot days”?</p>	<p>Comment noted. With regards to how to assess overheating risks and demonstrate that use of air conditioning has been minimised, we recommend using the GLA Energy Planning Guidance (this is referenced with a link in KP3).</p> <p>The comment regarding insulation preventing heat retention was intended to highlight that insulation can be used to prevent heat loss as well prevent over-heating.</p> <p>Proposed Change:</p> <ul style="list-style-type: none"> • KP5 “Use of insulation which can <u>help retain heat in the winter but prevent heat retention in the summer</u>”.
56	13	ECDC (Earls Court Development Company)	Low Carbon Heating and Renewable Energy, KP7	<p>This Key Principle again refers to the KPIs set out in Figure 3 (comment above). The definition of lower GWP potential is not stated. With the use of high energy efficiency and on-site heat pumps, plots are expected to achieve the 50% CO₂ savings stated over Building Regulations Part L 2021. However it is unclear which version of the regulations LBHF are referring to.</p> <p>Query to LBHF or proposed amendment: Text needs to refer to which set of Building Regulations Part L the savings should be shown beyond Part L 2013 or Part L 2021.</p> <p>“Low Global Warming Potential” needs to be defined. Does this mean the GWP of refrigerant and therefore linked to type of refrigerant or the amount of refrigerant charge within a system?</p>	<p>Comment noted on the Figure 3 related text. As highlighted above for Para 2.5 related comments, we will amend the text in KP7 to be consistent.</p> <p>Proposed change:</p> <ul style="list-style-type: none"> • “If this is not possible, <u>the development should seek to achieve renewable energy generation of should target at least 120 kWh/m2 footprint/yr</u>” <p>On the issue of the Global Warming Potential (GWP) of refrigerants, it is our understanding that the typical fluids used in Heat Pumps</p>

					<p>generally have a high GWP. Use of low GWP refrigerants are preferred (e.g. with a GWP value of <150).</p> <p>Proposed Change:</p> <ul style="list-style-type: none"> • “Use Heat Pumps with the best Coefficient of Performance ratings and PV panels with the highest efficiency - i.e. state of the art technology – in the interests of maximising on - site CO2 reductions. Heat Pumps with lower Global Warming Potential refrigerants (<u>i.e. those with a GWP value of <150</u>) are also preferred” <p>Regarding the query on Building Regulations, the 2021 Regulations are now the relevant ones, not 2013, so this will be clarified in the text.</p> <p>Proposed Change:</p> <ul style="list-style-type: none"> • “Achieve a minimum 50% reduction in CO2 emissions through on -site measures compared to the <u>2021</u> Building Regulations baseline” <p>There is also a similar reference to a target based on the Building Regulations baseline in KP 6 which can also be amended to refer to “current” Regulations.</p> <p>Proposed Change:</p> <p>KP6:</p> <ul style="list-style-type: none"> • “Achieve a minimum 35% reduction in CO2 emissions through on-site
--	--	--	--	--	---

					measures compared to the 2021 Building Regulation baseline "
57	13	ECDC (Earls Court Development Company)	Embodied Carbon, KP8	<p>The LETI embodied carbon targets are listed in Figure 3 but are not referred to in the embodied carbon Key Principle.</p> <p>The first phases of development will find the LETI targets very challenging, as they rely upon low densities and also the global supply chains to decarbonise (i.e. steel and concrete).</p> <p>Where the text states to “minimise the effect of embodied carbon”, how is this measured? Is it through achieving the LETI targets or through showing a reduction in embodied carbon through the design?</p> <p>The use of timber or other natural materials in residential schemes over 18m is extremely challenging due to Fire Regulations. ECDC would support LBHF in discussions to promote the use of timber with HSE, Local Fire Service and Building Control.</p> <p>Query to LBHF or proposed amendment: Can LBHF please clarify how the LETI targets outlined in Figure 3 relate to the embodied carbon Key Principle? There is no mention of them in the Key Principle.</p> <p>Building of medium+ density (i.e. above 3-4 storeys) will find the targets stated extremely challenging until global supply chains to decarbonise (i.e. steel and concrete). The Building Safety Act also means timber superstructures are more challenging over 18m, as well as acquiring warranties.</p> <p>Embodied Carbon will be minimised through design and specification by the applicant. It is therefore requested that LBHF set up stepped</p>	<p>Comments noted.</p> <p>Proposed Change:</p> <p>New paragraph 2.28 to reference LETI embodied carbon targets:</p> <p>2.28 Applicants for new developments should aspire to meet the LETI embodied carbon targets referenced in Figure 3.3. LETI have created the Embodied Carbon Primer document as supplementary guidance to their Climate Emergency Design Guide to aid those working in the built environment to reduce embodied carbon in buildings.</p> <p>The Council considers that the minimisation of embodied carbon can be demonstrated by meeting the LETI targets set out in figure 4.3 or achieving the GLA Whole Lifecycle Carbon benchmarks. It should be noted that this is currently not a policy requirement.</p> <p>Proposed change:</p> <p>New point inserted to KP8 for clarification:</p> <p>All developments should aspire to GLA Whole Lifecycle Carbon benchmarks as set out in</p>

				targets for applicants to progress towards the LETI ambitions, without seeming to have failed.	<p>Whole Life-Cycle Carbon Assessments guidance and/or LETI embodied carbon emission targets as set out in Figure 3.3.</p> <p>Comments on timber use are noted. Our current understanding is that structural timber can be used where appropriate fire testing standards are met, but there is still a ban on its use in residential buildings over 18m tall. It is not expected that timber will be used in all circumstances, however applicants may wish to consider its use in place of materials with a higher carbon footprint where this can be achieved.</p>
58	13	ECDC (Earls Court Development Company)	Water Efficiency, KP9	<p>The EC development is aiming to achieve balance in the water cycle through capture, storage, use and generation strategies. The development will minimise clean water usage and minimise water discharged into London’s waste systems. It is assumed the 160 is a reference from a previous document and is in error.</p> <p>Query to LBHF or proposed amendment: The text that states the development must “aim to achieve maximum water credits” is ambiguous. How would LBHF want the applicant to demonstrate this?</p>	<p>Reference to 160 is a typographical error and should have been a footnote superscript to the WAT01 standard:</p> <p>Proposed change:</p> <p>Amend bullet in KP9 to read:</p> <p>‘achieve at least the BREEAM excellent standard for the ‘Wat 01’ water category 460 or equivalent which is at least a 12.5% improvement over defined baseline performance standard.</p> <p>The council would expect relevant planning applications to be accompanied by the BREEAM assessment, and 5 credits are available under WAT 01 of BREEAM. The council recognises that the maximum score cannot be always achieved in every circumstance, however to reflect the strategic approach to water capacity in London Plan policy SI5, it is necessary to demonstrate that the optimal solution has been achieved.</p> <p>Proposed change:</p>

					<p>A minor clarification to the wording is suggested to the second sentence under</p> <p>Major Developments: Aim to achieve maximum use the score on water credits.</p>
59	13	ECDC (Earls Court Development Company)	Water Efficiency, KP9	<p>The text that states the development must “aim to achieve maximum water credits” is ambiguous. Maximum water credits would not be possible without, the use of vacuum toilets, rainwater harvesting and greywater recycling.</p> <p>Query to LBHF or proposed amendment: Does this mean maximum credits in Wat 01 or all the BREEAM Wat 01 – 04 credits?</p>	<p>The planning approach is set out in the London Plan policy SI 5 which refers to WAT 1 and clarifies that Part G of the Building Regulations is a requirement in London for all new dwellings to meet the tighter Building Regulations’ Optional Requirement of 110 litres per person per day.</p> <p>No change required.</p>
60	13	ECDC (Earls Court Development Company)	Transport and Movement, KP11	<p>How will the incorporation of Healthy Street principles be assessed? Is the Qualitative approach expected or is a score expected to be produced?</p> <p>Query to LBHF or proposed amendment: Is the Qualitative approach expected or is a score expected to be produced?</p>	<p>The Healthy Streets Assessment score cards are a combination of both quantitative and qualitative factors. TfL Scores reflect site specific interpretation, TfL Guidance, and the London Plan.</p> <p>No change required.</p>
61	13	ECDC (Earls Court Development Company)	Ecology, Biodiversity and Green Infrastructure	<p>This Key Principle is a ‘Must’ but the language “aim to exceed” is ambiguous.</p> <p>Query to LBHF or proposed amendment: The ‘aim to exceed’ should be ‘aim to meet or exceed’ and be identified as a ‘can’.</p>	<p>Until the council develops its own Urban Greening Factor scores, London Plan Policy G5 will apply. Agree that the text would benefit for further clarification is required.</p> <p>Proposed Change:</p> <p>Change wording in KP15 under ‘Major Development’, third sentence to better align with the London wording to read: Aim to exceed the Align with the London Plan Policy G5 recommended- target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development</p>

62	13	ECDC (Earls Court Development Company)	Flooding and Sustainable Drainage, KP18	<p>Please elaborate on what is deemed as “sufficient information on risk and mitigation measures” as this is ambiguous and requires clarification.</p> <p>Major developments are asked to meet Greenfield runoff rates. WSP have indicated that this is achievable if not bettered.</p> <p>Query to LBHF or proposed amendment: Confirm what is meant by “sufficient information on risk and mitigation measures”.to make it explicit.</p>	<p>Comment noted. “Sufficient information” would be information that is sufficient to show compliance with the requirements of our planning policies.</p> <p>Proposed Change:</p> <ul style="list-style-type: none"> “Sufficient information on the risks and mitigation measures to be included to demonstrate that meet national, regional and local planning requirements will need to be met met provided”.
63	13	ECDC (Earls Court Development Company)	Case Studies, Hartopp and Lannoy Point (text)	<p>There is no detailed breakdown of the carbon measurements for the development. E.g., is the development achieving the LETI embodied carbon targets and energy use intensity targets? So we propose that these are asked for so an evidence is clear for the targets.</p> <p>Query to LBHF or proposed amendment: It is noted that this project is at design stage. Are there examples of completed projects that achieve these targets? Could LBHF provide a detailed breakdown of the carbon measurements for the development. E.g., is the development achieving the LETI embodied carbon targets and energy use intensity targets?</p>	<p>Comments noted. Case studies are designed to be inspirational and aspirational and are not selected as optimal scenarios. It is intended that these developments will serve to provide inspiration for residents and developers. It is not expected that residents and developers will copy these case studies when forming their own projects.</p>
64	13	ECDC (Earls Court Development Company)	Case Studies, Swindon Cultural Quarter, Swindon	<p>Query to LBHF or proposed amendment:</p> <p>Is this development net zero carbon in construction, net zero carbon in operation or both? Please provide detail on the carbon ambitions for this development.</p>	<p>Comments noted. Case studies are designed to be inspirational and aspirational and are not selected as optimal scenarios. It is intended that these developments will serve to provide inspiration for residents and developers. It is not expected that residents and developers will copy these case studies when forming their own projects.</p>
65	13	ECDC (Earls Court Development Company)	Case Studies, The Forge, Southwark	<p>Query to LBHF or proposed amendment: The Forge website confirms that approximately 24% reduction in embodied carbon was achieved.</p> <p>There isn’t public confirmation if the LETI targets were achieved. Is meeting a target of an absolute figure of embodied carbon (kgCO₂e/m²) expected?</p>	<p>Comments noted. Case studies are designed to be inspirational and aspirational and are not selected as optimal scenarios. It is intended that these developments will serve to provide inspiration for residents and developers. It is not expected that residents and developers will copy these case studies when forming their own projects.</p>

66	13	ECDC (Earls Court Development Company)	Checklist – Energy Efficiency (first 2 bullets)	<p>Query to LBHF or proposed amendment: How should the applicant demonstrate that the opportunities described have been maximised?</p> <p>Are the KPIs referred to in the checklist the LETI KPIs from Table 3? If so, please can examples be provided of projects that have achieved the LETI EUI targets.</p>	<p>Comment noted. We don't think it is necessary to be prescriptive here about how information is provided to demonstrate this It could be provided in an Energy Assessment or other supporting document...</p> <p>The KPIs referenced here are the LETI ones. This can be clarified.</p> <p>Proposed change:</p> <ul style="list-style-type: none"> “Have you designed the fabric of the building to be ultra-low in energy demand, achieving <u>the LETI</u> KPIs for space heating demand (kWh/m2/yr) and energy use intensity (kWh/m2/yr) <u>where possible</u>?”
67	13	ECDC (Earls Court Development Company)	Checklist - Embodied Carbon (first bullet)	<p>Query to LBHF or proposed amendment: Are there embodied carbon targets to meet?</p> <p>There are no targets mentioned in the checklist. How would LBHF want the applicant to demonstrate that embodied carbon has been minimised? Is this question referring to embodied carbon or upfront embodied carbon. If the LETI embodied carbon targets stated in Table 3 are expected to be adhered to, please can examples be provided of projects that have achieved the LETI embodied carbon targets.</p>	<p>Comment noted. A reference to the LETI embodied carbon targets can be included.</p> <p>Proposed change:</p> <ul style="list-style-type: none"> "Have you implemented measures to minimise carbon emission within the construction process <u>and met LETI embodied carbon targets where possible</u>"?
68	13	ECDC (Earls Court Development Company)	Checklist – Ecology, Biodiversity and Green Infrastructure (first Bullet)	<p>Query to LBHF or proposed amendment: There is no mention of achieving KPIs in this checklist but KP15 refers to a minimum UGF that should aim to be achieved. Is the UGF referred to in KP15 a target an obligation or is it an ambition?</p>	<p>KP15 refers to what you must do to comply with London Plan policy G5 as explained in paragraph 2.47. The policy sets out the principles and details for applying and calculating the score. SPDs can only provide guidance.</p> <p>No change required.</p>

69	13	ECDC (Earls Court Development Company)	General	<p>Query to LBHF or proposed amendment: The language used in the SPD is sometimes loose or ambiguous. Clarity is required over where targets must be achieved and where they are guidance or ambitions.</p>	<p>Comments noted. The language and statements used are explained in the 'How to use this SPD' section of the SPD. The SPD cannot introduce new policy or requirements over and above the adopted development plan which dictates how the key principles can be worded. This is why there are 'Must Do' principles and 'Can Do' principles.</p> <p>Some changes are proposed to the wording and language to address your specific comments. See above changes.</p>
70	14	John Rowles	General	<p>I would like to make the following comments on the draft SPD for Climate Change:</p> <p>Overall I welcome the SPD but believe it can be improved upon, and you need to think more about how those carrying out a project without an architect will be able to make the right choices.</p> <p>The document will help guide architects, but could do more to guide householders who are making incremental improvements, or employing a builder directly, and need guidance on what ideally they should be doing first, and signpost residents to reliable sources of information. For example, if someone is replacing their boiler you could recommend they look up the latest advice from Which Magazine and state that the council libraries have an online subscription so residents can get free access there. If they have a house in a conservation area, or a listed building they can look up advice in the Conservation</p> <p>Directory (https://www.buildingconservation.com) for advice articles and details of contractors with experience of working on heritage buildings</p>	<p>Comments noted. The SPD is designed to be helpful and signpost good practice, however ultimately it is a planning document and we have to be mindful not to stray too far into non planning matters or promote commercial organisations. Replacing the boiler for example is something residents can do without planning permission.</p>

71	14	John Rowles	Retrofitting Homes	<p>Some of the advice is incorrect and is not scientifically justified. For example Historic England's guidance on windows shows that inserting double glazed panes into period sash windows is often not sustainable practice because the IGU sealed panes do not last (Historic England states its 15-20 years).</p> <p>When it comes to replacing old window frames, the wood used in period windows is nearly always higher quality, and can last centuries whilst nearly all modern wooden frames have much shorter life and have high levels of embodied carbon. Thus this area of the guidance needs to be drastically revised.</p> <p>Many slim lined double glazing units are not that effective at reducing noise from aircraft or buses and many residents on busy roads or affected by aircraft noise would be better served with secondary glazing. I recommend that you refer residents to the Historic England guidance</p> <p>(https://historicengland.org.uk/imagesbooks/publications/traditional-windows-care-repair-upgrading/)</p> <p>and this is likely to save residents a lot of money, and overall result in less carbon embodied being used.</p> <p>You could provide more guidance on how to select new replacement windows so that you encourage people to buy the ones with higher energy efficiency ratings, otherwise they will be at the mercy of the double glazing salesmen who will tell them there's only a marginal difference between the rating bands. Many older double glazing windows will have very low energy ratings, probably with no ventilation, poor security, and no proper subframe. Importance of workmanship:</p> <p>The lack of a subframe and cavity closers is extremely common and most retro fitted double glazed windows have gaping gaps around them, sometimes filled with short lived foam, and then covered up with thin strips of plastic and mastic. Residents need to be empowered with knowledge so they can get the most of their spend.</p>	<p>Comments noted, no change required. Where possible, the Council seeks to ensure that original features are retained in all buildings, especially where there is a heritage interest. The lifespan for timber windows (both historic and modern) can be maintained for a considerably greater period than 15-20 years with regular annual maintenance and general good care to prevent the most common causes of deterioration (wet rot, dry rot, wood boring insects, and general wear and tear). We note however that this is not possible for the Council to control replacement windows outside of a conservation area or in listed buildings where replacement windows are a permitted development right.</p> <p>The Council will be producing a webpage alongside this document that will include reference to best practice guides. This will include reference to the relevant historic England guidance, as well as guidance from other organisations such as the Society for the Protection of Ancient Buildings (SPAB). This will allow building owners to make informed decisions regarding which type of replacement window or carbon friendly solution is best for them.</p>
----	----	-------------	---------------------------	--	--

72	14	John Rowles	Retrofitting/ Heritage and Conservation	<p>5 Your guide is recommending the most drastic action, fully removing chimneys (a very carbon intensive intervention) which most people won't do unless gutting a house and provides little guidance on more modest measures that most people could undertake. The Historic England guidance is very good on how to improve energy efficiency and is applicable to all houses with chimneys and not just those being redeveloped</p> <p>https://historicengland.org.uk/images-books/publications/eehbopen-fires-chimneys-flues/heag080-chimneys/</p>	<p>Noted, no change required. The Council will be producing a webpage alongside this document that will include reference to best practice guides. This will include reference to the relevant historic England guidance, as well as guidance from other organisations such as the Society for the Protection of Ancient Buildings (SPAB). This will allow building owners to make informed decisions regarding chimney blocking or removal.</p> <p>No change required.</p>
73	14	John Rowles	Ventilation and Overheating (might be table 1, p45?)	<p>6. The guidance on ventilation needs to deal with communal areas as many are boiling hot in the summer and contribute to the overheating of flats. These areas often have too much glazing and often no opening windows, or vents. Maybe you need to recommend automatically opening and closing vents on new larger blocks.</p>	<p>Comments noted. An unintended consequence of higher insulation levels and more stringent air tightness standards for new buildings may be overheating but there is also evidence that these problems can be avoided in a well-designed and well-constructed development. A well-insulated shell can make it easier for occupants to keep the temperature at a comfortable level in both hot and cold weather. Some additional text in Paragraph 2.18 of the Ventilation and Overheating section can highlight this.</p> <p>Proposed Change:</p> <p>Para 2.18: “As a densely built inner London borough, H&F is particularly vulnerable to ‘Urban Heat Island’ (UHI) effects, in which urban areas can be up to 10°C warmer than surrounding areas. New developments need to be designed and built to provide adequate ventilation and avoid causing overheating in the summer. <u>It is important that use of higher insulation levels and more stringent air tightness standards do not lead to overheating. This can be avoided through good design and construction practices.</u> For existing buildings, there are retrofitting measures that should be considered to help improve air flow and keep over-heating to a minimum”.</p>

74	14	John Rowles	Table 1 - Building Adaption, p45	Article 4 Directions; you could make it clear in the body of the text what these are, as currently just mentioned in the table. I would recommend where you can find a list of the affected properties.	<p>Agree, we will provide clarification.</p> <p>Proposed Change:</p> <p>– ADD new final paragraph to page 44 as follows:</p> <p><u>The council's website lists properties where Article 4 Directions are in place to protect the character and appearance of buildings and the amenity of neighbouring residents from potentially harmful alterations and extensions. Some permitted development rights are removed and planning permission will be required to carry out the types of development which are restricted by each Article 4 Direction.</u></p> <p>Proposed Change:</p> <p>P44 ADD text to paragraph preceding Table 1 Options for building adaptation: <i>'Below sets out some general guidance on the main opportunities to retrofit heritage properties and how to find the best interventions for your property. Please note that not all measures will be appropriate for all buildings, <u>and you should check whether your property is covered by an Article 4 Direction.</u>'</i></p>
75	14	John Rowles	Transport and Movement KP12 and KP14	I welcome the advice on front gardens but I believe it needs to be expanded, or even made into a separate SPD, as you need to guide residents into doing the right thing and point out why it will benefit them too, i.e. it will make their home look nicer, their air quality and temperature will be improved, and they will benefit from a quicker sale when the time comes to move.	<p>Comments noted. However, there is very limited scope for the planning system to control front gardens. This SPD does contain best practice guidance in the Ecology Biodiversity and Green Infrastructure chapter, as well as in the Flooding and Sustainable Drainage chapter which can help promote climate- friendly front gardens.</p> <p>No change required.</p>

76	14	John Rowles	Omission	<p>Maybe you need to provide a section on how houses that have been divided up into flats can increase can make adaptations for climate change, either those managed by a property management company or resident managed? There is a high concentration of these in Hammersmith & Fulham</p>	<p>Comments noted. The SPD is applicable to flats for adaptations that can be achieved externally and are subject to planning control. Although these would need to be agreed with the property management company or landlord. Internal adaptations would need to be agreed with the property management company and can be achieved without planning permission.</p> <p>No change required.</p>
----	----	-------------	-----------------	---	--

77	15	Hammersmith BID	Transport and Movement/ General	<p>Colleagues at Hammersmith BID reviewed the SBD and agree with its scope and content. In particular we were pleased with the following aspects of the Draft SPD:</p> <p>Existing infrastructure: The document highlights how developments should complement the public realm and existing Active Travel infrastructure.</p> <p>Prevention: The document highlights the need for preventative measures, recognising the importance of carrying out climate impact assessments before developments begin.</p> <p>Recognition: There is recognition that current development policies do not fully support the borough to reach net zero, not least because Hammersmith & Fulham is continuing to develop and grow. However, the document considers existing policies, recognising that while there is still a lot to do if we want to reach net zero by 2030, we are not starting from 0 in understanding how to develop sustainably</p> <p>Pre-emptive: The document also highlights how the rise in extreme weather will change what provisions make buildings sustainable (greening, SUDs, ventilation etc.).</p> <p>Acknowledging varying capacity: The document acknowledges that the capacity for reaching targets and offering detailed assessments and information will differ according to the scale of the scheme.</p> <p>We anticipate that the final point will be of particular importance to our levy payers and were pleased with the inclusion of this acknowledgment</p>	<p>Support and comments noted.</p> <p>No change required.</p>
----	----	--------------------	--	---	--

78	16	The Woodland Trust	General	<p>The Woodland Trust is the UK's leading woodland conservation charity. The Trust is recognised as a national authority on woods and trees and a protector of the benefits and values that they deliver for society.</p> <p>We welcome the opportunity to comment on the Draft Climate Change Supplementary Planning Document (SPD) 2023.</p> <p>The climate crisis is paralleled by a nature crisis and we need solutions that will tackle both. A rapid increase in the rate of woodland creation has been proposed by the UK's Committee on Climate Change (CCC), to provide a key mechanism to lock up carbon in trees and soils, provide an alternative to fossil fuel energy and resource-hungry building material, and importantly to stem the declines in biodiversity.</p> <p>The Woodland Trust supports the CCC's recommended an increase in UK woodland cover from its current 13% of land area to 19% by 2050 to tackle this country's biodiversity and climate crises. More information can be found in the Trust's 2020 publication The Emergency Tree Plan.</p> <p>Trees and hedgerows help mitigate the impacts of climate change, delivering natural cooling in urban heat islands through transpiration as well as providing shelter and shade, and contributing to sustainable urban drainage systems. They also make a valuable contribution to the quality of the public realm, helping reduce air, noise and light pollution and improve people's mental health.</p>	<p>Comments noted.</p> <p>No change required.</p>
----	----	--------------------	----------------	--	--

79	16	The Woodland Trust.	Transport and Movement / Ecology, Biodiversity and Green Infrastructure/ Flooding and Sustainable Drainage	<p>We support the positive emphasis of the SPD on green infrastructure and nature-based solutions as part of the SPD. In particular, we welcome these draft policies:</p> <p>KP12 – support for incorporation of trees and soft landscaping to assist natural drainage and urban cooling KP14 – support for the retention of existing trees KP15 – promoting urban greening, and securing root protection areas for existing trees KP16 – protecting existing and planting suitable new trees and other green infrastructure KP17 – support for natural drainage solutions</p> <p>Integrating trees and green spaces into developments early on in the design process minimises costs and maximises the environmental, social and economic benefits that they can provide. We recommend the guidance published by the Woodland Trust Residential developments and trees -the importance of trees and green spaces (January 2019).</p> <p>In addition, we would recommend adding a preference for UK & Ireland sourced & grown tree stock, to support biosecurity and combat the threat of pests and diseases from imported plants.</p>	<p>This level of detail does go beyond the remit of the SPD. There is a link in KP16 to the Royal Horticultural Society’s webpages which have information on planting for climate change resilience, and information on native species. In addition, the council’s Climate Change and Ecology Strategy and Action Plan does contain commitments towards native species. For example, replacing street trees with native trees, and in Parks Management Strategies (ECO2.4 and ECO 3.3).</p> <p>No change required</p>
----	----	---------------------	---	--	--

80	17	Ealing Front Gardens Project	General	<p>We are pleased to see that your Draft Climate Change Supplementary Planning Document (SPD) 2023 includes several measures about hard surfaced front gardens and restoring them to green space. In view of the many and wide-ranging problems caused by this practice (summarised below), we welcome this.</p> <p>The main detrimental effects caused by front garden hard surfacing are:</p> <ol style="list-style-type: none"> 1. Increased risk of surface water flooding 2. Over-heating due to heat island effect 3. Loss of habitat and biodiversity – both above ground and below ground 4. Reduced food supply for pollinators 5. Increased air pollution (more dust, no pollution-absorbing hedges and trees) 6. Increased water pollution (run-off picking up contamination, not cleaned by percolation through soil) 7. Less CO2 absorption (both by plants and by soil sequestration) 8. Excess energy consumption and environmental damage cause by extraction, manufacturing and long-distance transporting materials 9. Increased risk of subsidence as soil beneath hard surfacing dries out 10. Loss of hedges, walls, other boundary structures and unique features create unattractive neighbourhoods, decreasing community cohesion, increasing societal problems and encourage vandalism 11. Adverse effects on mental health due to loss of green space 	Comments and support noted.
81	17	Ealing Front Gardens Project	Transport and Movement	<p>However, we'd like to see a much stronger focus on the actual parking surface. It should be (a) of minimum size to accommodate the necessary vehicles (recognising that this needs to be all at the same time for overnight charging if electric) and (b) genuinely green and permeable.</p>	<p>Paving over front gardens below 5sqms and the size of parking spaces in front gardens cannot be controlled through the planning system. The aim of this SPD is to promote best practice and is not intended to be exhaustive on measures that can be taken on the greening of parking spaces and gardens.</p> <p>No change required.</p>

82	17	Ealing Front Gardens Project	Biodiversity and Green Infrastructure/ Transport and Movement/Flood Risk	<p>The so called ‘permeable’ paving marketed by the big manufacturers depends for permeability on gaps between the pavers. But it doesn’t take long for these to become blocked with leaf, twig and other debris, moss and plants. After a few years, unless regular maintenance is carried out, the gaps become completely blocked. This means that there is nothing to prevent surface water runoff, especially in heavy downpours (see attached Gordon Road photo).</p> <p>Because permeable paving can therefore look quite uncared for after a few years, many householders choose impermeable surfaces, persuaded that they are maintenance-free. As you’ll know the current (2008) regulations allow impermeable surfaces as long as runoff is directed “to a soakaway area or rainwater storage within the property's boundary.” This is typically a grille or gap to make it qualify as ‘permeable’. But this also needs maintenance, otherwise it will also become blocked with similar debris after a few years, so doesn’t prevent runoff. (see attached Argyle Road photo)</p> <p>Gravel surfaces are more permeable (as long as they are laid on a permeable base). But all types of hard surfacing – paving and gravel – still create problems 2-11 listed above.</p> <p>So we think your draft document needs to be much more specific about the undesirability of all types of hard surfacing for parking, and to advocate matrix paving (plastic grids or concrete blocks) just for the parking surfaces, so that the soil surface is exposed between the gaps, plants can grow and drainage occur naturally.</p>	<p>Comment noted. The aim of this SPD is to promote best practice and is not intended to be exhaustive on measures that can be taken on the creation of parking spaces and retention of gardens. Use of permeable materials, such as a mix of planting and paving/blocks etc can be encouraged. The RHS guidance on parking seeks to ensure front gardens contain a balance of hard landscaping and plants, to prevent flooding, provide habitats and absorb pollutants. A link will be added to KP12 and KP16.</p> <p>Proposed Changes:</p> <p>Paragraph 2.53 in the section on Flooding and Sustainable Drainage:</p> <p>“Where hard surfaces are required, the preference is for run-off to be managed without directing it into the sewer system if this can be avoided. This can be implemented by using permeable or pervious hard surfaces use of permeable materials, such as a mix of planting and paving/blocks in designs for car parking areas or patios and hard landscaped areas for example, or by directing surface water into soft landscaped areas where it can infiltrate into the ground. The Royal Horticultural Society (RHS) provide helpful guidance on designing planting and permeable surfaces into front gardens. In locations with suitable soils, soakaways may be possible to help manage run-off, so long as they are designed and installed to comply with Building Regulation requirements such as the “5m rule””.</p> <p>KP12 in the Transport section (All developments first bullet-point):</p>
----	----	------------------------------	---	---	---

					<ul style="list-style-type: none"> “Replacing parking areas and other hard surfaces with permeable surfacing, and planting trees and soft landscaping can reduce surface water flooding in heavy rainfall, and help cool the local environment during heatwaves” RHS guidance on parking seeks to ensure front gardens contain a balance of hard landscaping and plants, to prevent flooding, provide habitats and absorb pollutants. <p>KP 16 (Greening section):</p> <ul style="list-style-type: none"> “Replace impervious hardstanding and paving and avoid replacing soft landscaping and lawns with paved areas. The RHS guidance provides detailed advice on options you could take.
83	17	Ealing Front Gardens Project	Flooding and Sustainable Drainage Section 2.53 Page 39:	it would be good to distinguish between surfaces for car parking which can and should be matrix type, and other surfaces such as patios. See attached photo Luxembourg.	<p>As discussed above, aim of this SPD is to promote best practice and is not intended to be exhaustive on measures that can be taken. Use of permeable materials, such as a mix of planting and paving/blocks etc can be encouraged. A link to the RHS guidance on how to reduce paving and increase planting will be added to KP12, KP16 and to paragraph 2.53 (see rep no 82).</p> <p>Image 13 will be removed as there are a variety of design options available to achieve permeable surfaces and landscaping/greening solutions. Example images are set out in the RHS guidance but can also be added to the website.</p> <p>Image to be removed.</p>

84	17	Ealing Front Gardens Project	Transport and Movement	<p>For front gardens in particular, the parking area should be (a) only of minimum size to accommodate the necessary vehicles (recognising that this needs to be all at the same time for overnight charging if electric) and (b) genuinely green and permeable. In our view the only surfaces that meet this requirement currently are matrix pavers, either concrete or plastic. These keep the soil planted and accessible to water and air, and all other areas of the garden should remain green and planted.</p> <p>This applies to the following draft policies:</p> <p>KP12: change “Replacing parking areas and other hard surfaces with permeable surfacing” to “Replacing parking areas with the minimum amount of matrix paving to park the necessary vehicles, and restore all other hard surfaces to planted and green”.</p>	<p>The size of parking spaces in front garden cannot be controlled through the planning system. The aim of this SPD is to promote best practice and is not intended to be exhaustive on measures that can be taken on the greening of parking spaces and gardens.</p> <p>No change required.</p>
85	17	Ealing Front Gardens Project	Ventilation and Overheating	<p>KP4: should mention parking surfaces specifically.</p>	<p>Comment noted. It is assumed this relates to how greening of parking spaces can help reduce Urban Heat Island effects and overheating. A link to the RHS guide on how to reduce paving and increase planting will be added to KP12 in the transport and Movement chapter.</p> <p>Proposed change:</p> <p>KP4:</p> <ul style="list-style-type: none"> • “Use soft landscaping and green infrastructure to help provide shading and reduce surface temperatures. <u>Other features can also help reduce heat island impacts, and use of permeable materials, such as a mix of planting and paving/blocks etc can be encouraged.</u>”

86	17	Ealing Front Gardens Project	Ecology, Biodiversity and Green Infrastructure	KP16: (Ecology, Biodiversity and Green Infrastructure) change “Replacing impervious hard standing and paving and avoid replacing soft landscaping and lawns with paved areas” to “Replacing all hard standing with the minimum amount of matrix paving to support the vehicle(s), replace other paving with planting and avoid replacing soft landscaping and lawns with paved areas”	The best practice set out in KP16 is not intended to be exhaustive on measures that can be taken on the greening of parking spaces and gardens. No change required.
87	17	Ealing Front Gardens Project	Ecology, Biodiversity and Green Infrastructure	Image 13 (page 37) – replace the paving slabs with matrix pavers and the gravel with ground cover plants or grass.	Comments noted. Image 13 will be removed as there are a variety of design options available to achieve permeable surfaces and landscaping/greening solutions. Example images are set out in the RHS guidance but can also be added the accompanying webpages. Image to be removed.
88	18	Michael Pritchett	General	The proposed SPD is deeply inadequate. "Millions of people have died through flooding and fire." "That's fine. We have preserved all the single glazed windows in conservation areas in H&F." This fictional exchange illustrates the problem. The SPD pretends that the climate challenge can be solved mainly be getting other people (i.e. developers but not the council, not existing buildings) to make most of the changes. As the area is largely built over this is not a response to an emergency.	Comments noted. No change required.
89	18	Michael Pritchett	Heritage and Conservation Areas	A major fallacy in this SPD is the primacy of conservation fundamentalists over the climate emergency. It is not good enough to make no new climate related improvements permissible by policy in conservation areas. The idea of people, one by one, applying for pre-application advice on improvements they have no idea will be supported is laughable. Officers never give such advice on time and it is nearly always a checklist of obstacles. Climate related improvements should be judged on the balance between destruction caused by the emergency and the damage caused by heritage. It should not be a heritage veto. Two different officers should look at this, and climate should win if it is finely balanced. Just as an example, it is now possible to get double glazing in wooden sash windows that can barely be perceived. Double glazing should be permitted, if in the closest possible design and materials to	Comments noted. The Council has a statutory duty to ensure the protection of heritage while combatting climate change. The Council is unable to make changes to permitted development rights as these are set centrally by the Government at a national level. When granting permission for climate-based interventions officers consider a range of factors including the level of harm caused by the intervention to the asset balanced against the benefit gained by the intervention. All applications are considered on a case-by-case basis and comments are sought from officers in the relevant Council services where appropriate to assist officers in reaching a

				the original single glazing, without permission, if the original windows are Victorian or later. Similar logic should be applied to everything else.	decision on whether to grant planning permission.
90	19	GLA	Air Quality	<p>In 2.41, I wondered if the intention was to say: “Air quality is a material consideration in the assessment of planning applications. The London Plan’s air quality positive approach links other policies in the London Plan, such as Healthy Streets, energy master planning and green infrastructure. The London Plan and Local Plan both have reducing the need to travel by private vehicle and promoting sustainable travel choices - walking and cycling - as strategic priorities,”</p> <p>2.42 says, “It is considered best practice for businesses to have a travel plan and an active travel strategy. These encourage sustainable transport and active travel, to reducing local congestion and improving air quality, reducing commuter car journeys. Providing secure cycle storage is another practical way of positively encouraging cycle ownership and active travel. It is best to avoid stove burners which are a significant contributor to poor quality because of the high level of particulate pollution, even with approved fuels.... “</p>	<p>Comment on travel and urban greening are covered under the relevant chapters in this SPD, and the council acknowledge that air quality is a cross-cutting theme. The KP12 bullet point on cycle provision has been moved to KP11 as a ‘Must Do’ requirement.</p> <p>Comments noted. It is considered that this level of detail is not appropriate for this SPD, and secondary heating choices do not fall under the remit of planning control. It is very unlikely that stove burners will be a primary heating source.</p>
91	19	GLA	Air Quality	It might be worth mentioning that the use of solid fuels for primary or secondary heating in a new development will mean it is not Air Quality Neutral and therefore mitigation or offsetting will be required.	<p>Comments noted. It is considered that this level of detail is not appropriate for this SPD and secondary heating choices do not fall under the remit of planning control. It is very unlikely that stove burners will be the primary heating source in new development.</p> <p>It is noted that policy is already in place to secure air quality neutral development. Detailed air quality policy, assessment requirements and mitigation options for development proposals are set out in the London Plan (Policies SI1 and SI2) which require that all development must be at least air quality neutral.</p>

92	19	GLA	Ecology, Biodiversity and Green Infrastructure	<p>KP14 says, “Planting improves air quality: By planting up more of our surrounding surfaces such as walls, roofs, buildings and fences around our gardens we can substantially reduce harmful particulates that pollute the air.”</p> <p>It might be helpful to mention that choosing an appropriate species is important and the size, location and density will affect the effectiveness of this measure. There could be an opportunity to signpost to some existing research on this.</p>	<p>Comments noted; however this level of detail is beyond the remit of the SPD and would be more appropriate for site specific advice. This is a cross-cutting chapter, and greening and biodiversity principles are primarily set out in the Ecology, Biodiversity and Green Infrastructure chapter. There is a link in KP16 to the Royal Horticultural Society’s webpages which have information on planting for climate change resilience, and information on native species. In addition, the council’s Climate Change and Ecology Strategy and Action Plan does contain commitments towards native species. For example, replacing street trees with native trees, and in Parks Management Strategies (ECO2.4 and ECO 3.3).</p> <p>No change required.</p>
----	----	-----	---	--	--

93	20	Telereal Trillium	General	<p>We write on behalf of Telereal Trillium (“TT” and/or “our client”) with respect to the current consultation on the draft Climate Change SPD (“the SPD”). TT are a commercial property development and investment company with a number of land holdings and developments within Hammersmith and Fulham, and these representations focus on the draft requirements of the SPD and potential implications of these on delivery of TT’s development proposals.</p> <p>TT fully support the aspiration of the SPD to help implement the actions contained in LBHF’s climate change strategy and address the climate and ecological emergency declared by the Council in 2019. TT are committed to maximising the sustainability performance of their developments and wider portfolio as far as is feasible and deliverable.</p> <p>However, TT have concerns regarding some standards and requirements introduced within the draft SPD which go beyond requirements within the Development Plan, and without viability testing are unclear whether these requirements and standards are achievable and deliverable.</p> <p>For example, the SPD introduces the aspiration for developments to achieve LETI KPI standards with regards to energy efficiency, U values and embodied carbon.</p> <p>There is no requirement within the adopted Development Plan (neither the LBHF Local Plan 2008 or the London Plan 2021) for development to achieve these standards, and there is no evidence within the draft SPD that these requirements are deliverable or feasible.</p> <p>Other examples include the SPD specifically seeking major developments to exceed London Plan requirements of a target UGF score of 0.4 in residential developments, and 0.3 in commercial developments, as well as introducing specific targets for renewable energy generation.</p> <p>TT have concerns that without testing that these requirements are deliverable or feasible, the introduction of requirements above and beyond Development Plan policy may significantly challenge the deliverability of developments, particularly within the current context of significant cost inflation, increasingly stringent fire and Building</p>	<p>Comments noted.</p> <p>Clarification with regard to the LETI KPI’s will be provided with a ‘Can do’ key principle box which we have introduced to this section of the SPD in order to show that the LETI KPI’s are not mandatory.</p> <p>Seeking to exceed the Urban Greening Factor target is in line with the London Plan which forms part of the development plan for the borough.</p> <p>No change required.</p> <p>Signposting or re-stating existing policy in the SPD is considered good practice in a guidance document to highlight important policy and standards in context, in this case climate change. All SPD principles should be read alongside the adopted Development as a matter of course.</p>
----	----	-------------------	----------------	--	---

			<p>Regulation Requirements and the aspiration to maximise the delivery of affordable housing.</p> <p>In light of these concerns, TT consider that the SPD should only require developments to meet standards the Development Plan policy to which they relate as supplementary guidance. SPDs cannot seek standards or requirements which exceed Development Plan requirements and even those requirements which add detail to the Development Plan should be subject to viability testing to demonstrate they are feasible and deliverable.</p> <p>Furthermore, the SPD should remove simple repetition of Development Plan and Building Regulations as this is unnecessary duplication and there is a risk that the exact policy requirements are not reflected accurately.</p> <p>TT also request that the SPD is amended to provide greater clarity on how applications would be assessed against the criteria in 'What you CAN do' as opposed to 'What you MUST do', particularly with regards to renewable energy, CO2 reduction and LETI KPI standards mentioned above as the current draft provides greater uncertainty on sustainability requirements, as opposed to providing greater clarity as the guidance is intended for.</p> <p>We would welcome the opportunity to discuss these representations with the policy team, should any queries arise.</p>	
--	--	--	---	--

Schedule of Minor Technical Changes

No.	Section	CHANGE (MINOR WORDING CHANGES UNLESS INDICATED)
1	General	Re-number KPs Throughout, reflecting additional KP at the beginning
2	General	Rename KPs KP to KPC throughout
3	Key interventions diagrams p10 and 11	Add bird box and front garden parking
4	Retrofitting para 2.3	To see if you need planning permission and get free advice for your retrofit scheme, please visit Climate change and planning LBHF
5	10 New homes Diagram	<p><u>Low Carbon Heating Systems</u></p> <p>Proposed Change:</p> <p>“Low Carbon Heating Systems</p> <p>New homes should use low carbon heating systems such as heat pumps or electric boilers as an alternative to gas central heating. Where homes can be connected to heat networks this should be a priority”</p>
6	11 Retrofitting homes Diagram	<p><u>Replacement Heating System</u></p> <p>Proposed Change:</p> <p>“Replacement Heating System</p> <p>New gas boilers should not be installed. Heat pumps are considered a climate friendly alternative. The use of alternatives to gas boilers is encouraged such as heat pumps and electric boilers”.</p>
7	12 Non-domestic buildings diagram	<p><u>Low Carbon Heating</u></p> <p>Proposed Change:</p> <p>Add a heat pump to the green roof on the diagram next to the PV panels. Amend the 1st line of the “Renewable Energy” text slightly as follows:</p> <p>“Renewable Energy</p> <p>Consider how renewable energy sources such as solar panels and heat pumps can be incorporated into the development to match annual energy use of the building”</p>
8	13 Mixed use buildings and high-rise buildings diagram	<u>Low Carbon Heating</u>

		<p>Proposed Change:</p> <p>Add a heat pump to the green roof on the diagram next to the PV panels. Amend the 1st line of the “Renewable Energy” text slightly as follows:</p> <p>“Renewable Energy</p> <p>Consider how renewable energy sources <u>such as solar panels and heat pumps</u> can be incorporated into the development to match annual energy use of the building”.</p>
9	16 Net zero Carbon Buildings	<p>Proposed Change:</p> <ul style="list-style-type: none"> • “All new buildings should be built with a low carbon heating systems and where possible should avoid connecting to the gas network. <u>Instead, developments should connect an existing heat network if one is available or be designed to connect to one in the future”.</u>
10	Page 16	<p>Low carbon heating</p> <ul style="list-style-type: none"> • All new buildings should be built with low carbon heating systems e.g. Heat Pumps and where possible should avoid connecting to the <u>any existing</u> gas network
11	20 Ventilation and Overheating (last bullet-point line of KP3 text)	<p>Proposed Change:</p> <p>Correct the text in the last bullet-point of KP3 to <u>“a Heat Pump”</u> as suggested.</p>
12	21 KP4 bullet points	<p>The bullet point formatting is wrong in the text box for KP4.</p> <p>Proposed Change:</p> <p>Amend the bullet-point format to match that used in other boxes. Align KP4 and KP5 text boxes better on the page if possible.</p>
13	21 KP5 text	<p>Proposed Change:</p> <p>Amend this KP5 bullet-point text to say: “Reliance on <u>Minimise the use of</u> air conditioning systems should be minimised but <u>include</u> heat recovery used if they are <u>have to be</u> installed”.</p>
14	22 Renewable Energy and Low Carbon Heating (Para 2.20)	<p>Proposed Change:</p> <p>“2.20 Gas boilers are the single largest contributor to CO2 emissions locally and the council’s vision is that the borough’s heat and power will be supplied by renewable energy and, where possible, by local sources that efficiently meet demand. Use of low-carbon heating <u>– including through making connections to low carbon heat networks –</u> will have a <u>significant</u></p>

		<p>much greater benefit in terms of reducing CO2 emissions than renewable electricity generation. <u>Renewable energy generation will also reduce a development's carbon footprint".</u></p>
15	23 Low Carbon Heating Para 2.24	<p>Proposed Change:</p> <p>Correct the text in this Paragraph to read "Passivhaus"</p>
16	24 KP7 text	<p>Amend the text in the last bullet-point to KP7 also refer to secondary glazing option.</p> <ul style="list-style-type: none"> • "Explore options to improve the thermal efficiency of the building through use of alternative glazing, <u>such as secondary</u>, double, triple, or vacuum glazing should be carefully considered. Upgrade or replacement of existing should look to replicate the form of original windows as closely as achievable".
17	24 KP7 text	<p>Proposed Change:</p> <p>Add a bullet-point to KP7 (after the bullet point on using Heat Pumps with best CoP ratings...)</p> <ul style="list-style-type: none"> • <u>"Where new hot water systems are installed, consider including a "heat pump ready" hot water cylinder"</u>
18	Page 30, para 2.36	<p>Vehicle emissions contribute to the increasing concentration of gases that are leading to climate change. The principal greenhouse gases associated with road transport are carbon dioxide (CO2), methane (CH4) and nitrous oxides (N2Ox). Road transport is</p>
19	Page 32, KP12 Key Principles – What You CAN Do	<p>Major developments</p> <ul style="list-style-type: none"> • Provide facilities to encourage cycling, such as secure parking and cycle storage. • <u>Provide Cargo bike parking spaces to encourage a switch to Zero Emission Last Mile vehicles for servicing, maintenance and deliveries</u> • Provide electric car charging points (EVs) in car parking spaces to encourage a switch to low emission electric vehicles. <p>Existing Commercial Uses and New Developments</p> <ul style="list-style-type: none"> • Provide a Green Travel Plan for Staff ○ Encourage cycling by provide safe cycling storage, e[1]cycle charging points, lockers, changing space and shower facilities. • <u>Provide Cargo Bike Spaces to encourage Switch to 'Zero Emission last mile' Logistics and Servicing</u> • <u>Provide agnostic parcel lockers to reduce repeated missed deliveries</u> ○ Provide electric vehicle charging points and switch to electric fleet vehicles ○ Switch to ' last mile' Logistics and Servicing- ○ Provide Cargo bikes spaces

20	33 Air quality paragraph 2.42	<p>Replace Image 9 with H & F map for 2025 where Annual Mean concentrations above 20 ug/m⁻³ are considered area's of poor air quality</p> <p>2.42 It is considered best practice for businesses to have a travel plan and an active travel strategy. These encourage sustainable transport and active travel, to reducing local congestion and improving air quality, reducing commuter car journeys. Providing secure cycle storage is another practical way of positively encouraging cycle ownership and active travel. It is best to avoid stove Solid Fuel burners e.g. wood which are a significant contributor to very poor air quality because of the high level of particulate pollution, even with approved fuels. Greening any parking spaces and planting hedges and other air quality friendly vegetation can contribute to improving local air quality.</p>
21	35 Ecology, Biodiversity and Green Infrastructure	Improve Image11 p36 Remove Image 13 p37
22	37 Ecology, Biodiversity, Green Infrastructure KP 16 text	<p>Amend typo mistake.(bullet point on installing green/brown roof)</p> <p>Proposed Change:</p> <p>Amend the text in this Paragraph to read "<u>install</u>" as suggested.</p>
23	39 KP 17	<p>Proposed Change:</p> <p>Amend the KP 17 text by adding a new bullet-point to say:</p> <p><u>"For major schemes, the development of an Integrated Water Management Strategy for the site is encouraged".</u></p>
24	39 KP 17	<p>A review of the wording shows that some of the "Can Do" text should be amended, new bullet-points added to KP17 and some of the existing text included in KP18.</p> <p>Proposed Change (KP17):</p> <ul style="list-style-type: none"> • Developments along the riverside which incorporate river wall defences should use the opportunity to raise the defences in line with Thames Estuary 2100 Plan principles • Include rainwater harvesting systems to collect rainwater for re-use such as for toilet flushing or for irrigation of landscaped areas • Plant trees and other soft landscaping features such as rain gardens and green walls to intercept rainwater and allow it to drain into the soil below • Include living roofs (incorporating blue roof storage) • Maximise the additional benefits that landscaped SuDS features can provide in addition to flood management by planting to encourage biodiversity • <u>Manage all surface water run-off using SuDS measures with no discharges to the sewer system</u> • <u>"For major schemes, the development of an Integrated Water Management Strategy for the site is encouraged"</u>

25	39 (Flooding and SUDS) Para 2.53	<p>Amend the text by deleting this.</p> <p>Proposed Change:</p> <p>“Where hard surfaces are required, the preference is for run-off to be managed without directing it into the sewer system if this can be avoided”.</p>
26	39 (Flooding and SUDS) Para 2.53	<p>Amend the text to include reference to using permeable surfaces.</p> <p>Proposed Change to Para 2.53 (other changes in response to other comments also shown):</p> <p>“Where hard surfaces are required, the preference is for run-off to be managed without directing it into the sewer system if this can be avoided [deleted in response to a separate comment]. This can be implemented by using permeable or pervious hard surfaces <u>use of permeable materials, such as a mix of planting and paving/blocks</u> in designs for car parking areas or patios and hard landscaped areas for example, or by directing surface water into soft landscaped areas where it can infiltrate into the ground. <u>The Royal Horticultural Society (RHS) provide helpful guidance on designing planting and permeable surfaces into front gardens.</u></p> <p><u>In locations with suitable soils, soakaways may be possible to help manage run-off, so long as they are designed and installed to comply with Building Regulation requirements such as the “5m rule” [added in response to a separate comment].</u></p>
27	40 KP 18	<p>Amend the text to refer to Policies CC3 and CC4 instead.</p> <p>Proposed Change:</p> <p>"All planning applications must include a Flood Risk Assessment (FRA) Where the site is in question is located in an area identified as being at risk of flooding in Policies CC3 and CC4 <u>CC3 and CC4</u> CC2 of the Local Plan"</p>
28	40 KP 18	<p>Proposed Change (KP18):</p> <ul style="list-style-type: none"> • All planning applications must include a Flood Risk Assessment (FRA) where the site in question is located in an area identified as being at risk of flooding in Policy CC2 of the Local Plan • FRAs should take account of the impacts of climate change on sea level rises and rainfall. For the latter, a climate change factor of +40% should be used when assessing future storm scenarios Sufficient information on the risks and mitigation measures to be included to meet national, regional and local planning requirements will need to be provided. • Details of appropriate mitigation measures such as structural waterproofing and sewer surcharge protection measures for basement/lower ground floor development should be provided alongside other mitigation measures. Examples of these are provided in the council's Planning Guidance SPD. • Follow the Drainage Hierarchy and provide details of proposed Sustainable Drainage Systems (SuDS). The level of detail required and the targets that are required to be met are different for major and minor schemes, with more stringent attenuation requirements set for major schemes

		<ul style="list-style-type: none"> • Reduce any discharges of surface water to the sewer to the greenfield rate (majors). All other schemes should minimise discharges • <u>Include rainwater harvesting systems to collect rainwater for re-use such as for toilet flushing or for irrigation of landscaped areas</u> • <u>Plant trees and other soft landscaping features such as rain gardens and green walls to intercept rainwater and allow it to drain into the soil below</u> • <u>Include living roofs (incorporating blue roof storage)</u> • <u>Maximise the additional benefits that landscaped SuDS features can provide in addition to flood management by planting to encourage biodiversity</u>
29	40 SuDS “Bubble” diagram	<p>The image highlights the benefits of SuDS which should be referenced in the text. The best place to do this looks to be Paragraph 2.52.</p> <p>Proposed Change:</p> <p>Amend the image by giving it a title and Image number</p> <p>Add the following text to the end of Para 2.52: “Green features such as green roofs and walls, rain gardens and swales can provide multiple benefits for people and wildlife in addition to managing surface water, so these are preferred as part of a SuDS Strategy, as are rainwater harvesting measures where these are possible. <u>SuDS can provide multiple environmental benefits, as highlighted in the Image</u>”.</p>
30	59 Glossary	<p>Add <u>Article 4 Direction</u> reflecting addition to Table 1 as defined on H&F website: Permitted development rights allow certain building works and changes of use to be carried out without having to make a planning application. <u>An Article 4 Direction removes permitted development rights for a specific property or area, which means a planning application will be required.</u></p>