

COUNCIL STATEMENT

Chapter 4 – Environmental Sustainability

14. DM21 Part A.e? What is meant by local and is this feasible? It is a legitimate planning aim, is it enforceable? I suggest this is moved to the supporting text. Why is D necessary given that this is set out in the London Plan?

Locally sourced labour refers to both residents and businesses based in Haringey Borough. DM21.A(e) is considered to be in conformity with London Plan policy 4.12 and expands its scope to ensure that strategic, as well as other development proposals, seek to support local employment opportunities from the construction to end user phase. Whilst recognising that the London labour market is relatively integrated and people will find employment at varying distances from where they live, the policy aims to facilitate sustainable development by supporting local residents and businesses in accessing job opportunities arising from planned growth, and to deliver other transport and environmental benefits by reducing the need for long distance commuting. The policy is positively worded and seeks that developers engage with the Council to identify opportunities for using locally sourced labour.

It is acknowledged that DM21.D reflects the London Plan approach to carbon offsetting, however the regional policy pertains to Major development only. The DM policy will ensure the Council is positioned to capture carbon offset funding for Minor development, where appropriate, should opportunities arise over the plan period. The inclusion of the policy also **reinforces the Council's commitment to, and provides a basis for, the use of funding** towards local carbon reduction projects or programmes.

15. DM22. Part C. The policy is too prescriptive and onerous. Is this always the best option for major development to meet the aims of the policy? What about viability and feasibility? Is criterion d supposed to deal with this point? If so, it would need rewording to make it clear that b and c are subject to viability and feasibility. Part E. This should be moved to the supporting text as it is not planning policy.

DM22 gives effect to London Plan policies 5.5 and 5.6. It is informed by Haringey's Decentralised Energy Masterplan (2015), which supports the setting of threshold distances to DE networks for different development scales, where there is a clear expectation of connection to an existing or planned future network. DM22.C(d) provides that the requirements of 22.C(b) and 22.C(c) are subject to technical feasibility and financial viability, although it is acknowledged that the policy could be reworded to make this clearer. The intention of 22.C(d) is to provide sufficient flexibility for proposals to come forward and deliver sustainable energy systems, whilst reflecting the priority for connection to existing and planned DE networks wherever possible, in line with the London Plan.

With regard to part E – currently, community/district energy is an unregulated sector and while DE networks could be publically or privately owned, within the private sector there is no method of recourse for occupiers. Where DE networks are vulnerable due to poor

management or customers leaving, this may put building occupiers reliant on these systems at risk (i.e. poorer service standards or higher pricing), thus compromising strategic policy and plan objectives, including those set out in NPPF (paragraph 96) and London Plan policy 5.5B(a). The policy signposts and encourages the use of customer charters as a safeguarding measure.