

Public Examination into the Haringey Core Strategy June 2011

Indicative Matters and Issues for Examination

Hearing 3

Matter 3 Issues 3.1 – 3.9

Does the Core Strategy provide a suitable and evidenced strategic direction for matters relating to climate change, waste management and water resources?

- i. The Council aims to reduce the carbon footprint of development in Haringey and reduce and manage the risks which relate to predicted climatic changes in line with policies and aspirations at national, regional and local level. While developing the policy the Council paid attention to PPS1 and its statement for climate change, PPS 22 and the accompanying guidance. We considered the implications of national Code for Sustainable Homes, London Plan (2008) and the draft London Plan (2009) policies and targets on climate change and the Mayor's Adaptation strategy.
- ii. As stated in the Core Strategy page 46, responding to climate change and managing Haringey's environmental resources more effectively to make Haringey one of London's greenest boroughs is a key objective in the Sustainable Community Strategy. The predicted growth over the next 15 years in Haringey means that reducing carbon emissions from new and existing buildings transport and business activity is a key challenge for the Core Strategy. The spatial strategy (page 54), Managing Growth policy (SP1), and Transport policy (SP7) aim to make efficient use of land for growth in areas near public transport and by promoting sustainable transport modes. Other Core Strategy policies with wider implications for climate change include the Water Management and Flooding (SP5) (page 98-100), Waste and Recycling policy (SP 6) (Page 102-103), Design policy (SP11) for sustainable design and construction covering both climate change mitigation and adaptation including use of materials such as embedded energy and greening (page 140-141), and the Open Space and Biodiversity (SP13) policy for climate change adaptation. All Core Strategy policies have been subject to Sustainability Appraisal which includes objectives for climate change.
- iii. Specifically, the policy Working Towards a Low Carbon Borough SP4 page 90 focuses on energy use in buildings and creating low carbon energy supply systems and networks, and opportunities for generation of renewable energy. Haringey's Greenest Borough Strategy and the local evidence base indicate that the majority of carbon emissions in Haringey come from use of fossil fuel based energy in our homes (Core Strategy para 4.1.6). This is in line with the national and regional findings.

- iv. Local evidence to support the SP4 includes the Greenest Borough Strategy, local studies especially the Carbon Reduction Scenarios study and the Climate Change, Site Development and Energy Infrastructure study (energy Infrastructure study in short), Council's emerging 40:20 Action Plan, outcomes of the sustainability appraisal, and the public consultation outcomes.
- v. The SP4 policy for meeting the carbon reductions in buildings is framed according to the Mayor's energy hierarchy; firstly to reduce energy demand by efficient site use and orientation, good design and improvements to building fabric, secondly the use of energy from more efficient sources such as decentralised energy networks (or making connections to such networks feasible in the future) and thirdly by requiring the generation of energy on-site by use of renewable energy.
- vi. The policy interventions for the climate change mitigation and adaptation runs through the Local Development Framework. In addition to the Core Strategy policies, the Council is working on a Development Management DPD, and a Sites DPD, and a Sustainable Design and Construction SPD with policies and guidance provided at appropriate levels.
- vii. The decentralised energy options and the identification of future decentralised energy hubs also relate to the Council's aim for reducing carbon emissions from existing buildings. As stated in the Core Strategy submission draft page 93 Haringey was the first local authority to commit to reducing carbon emissions by 40% by 2020 on a 2005 baseline. Projects to support this aim include the Muswell Hill Low Carbon Zone, emerging Broadwater Farm Decentralised Energy scheme, centred on a social housing estate, and a social enterprise company raising funds from local people to invest in community owned renewable energy. In order to create a transparent framework for reporting on action on climate change, in January this year the Council introduced an Annual Carbon Report.
- viii. The Council is one of nine local authorities across England taking part in a Department of Energy and Climate Change (DECC) Low Carbon Framework Pilot project which is providing funding and expert support for the development of the 40:20 Action Plan. As part of this work, Haringey has carried out studies for developing the UK's first "lite" electricity supply licence agreement. This would enable local authorities to enter into agreements with electricity suppliers to retail electricity produced from council owned combined heat and power plants, an investment prospectus and joint procurement strategy for solar photovoltaic arrays on Council owned assets across north London, and a strategy for inward investment into green enterprise in the Upper Lee Valley.

1. Issue 3.1

To what extent is the Core Strategy and SP4 in general conformity with both the London Plan and its draft replacement?

- 1.1 The Core Strategy, together with the proposed minor changes as referenced below, is considered to be in general conformity with the framework for climate change mitigation and adaptation provided by the London Plan and the draft replacement London Plan, and aims to set out policies which relate to local issues without the need to repeat the policies at regional level. Further minor changes are proposed in this paper for clarity purposes where relevant.
- 1.2 The Core Strategy policy is considered to be in general conformity with the London Plan 2008 policies 4A.1 to 4A.8 which relate to climate change mitigation and draft London Plan policies 5.1-5.8. The Greater London Authority's comments on the Core Strategy Submission draft SP4 policy and the supporting text regarding more clarity on the energy hierarchy is taken into account (minor change 22/5/4.1 and 22/17/4.1).
- 1.3 Core Strategy is considered to be in conformity with the London Plan Policy 4A.9 to Policy 4A.18 and the draft London Plan policies 5.9-5.5 on climate change adaptation. The Council agreed with the comments from the GLA on the Core Strategy Submission draft that more emphasis on climate change adaptation issues is needed. The GLA was consulted on the minor changes proposed by the Council (minor change 22/17/4.1) to strengthen the Core Strategy text in this respect.
- 1.4 The emerging Development Management DPD and the Sustainable Design and Construction SPD will provide further details on the climate change adaptation measures at appropriate levels including energy hierarchy and energy statements.

2. Issue 3.2

Is SP4 sufficiently flexible and in accord with PPS22 (see para 8?) and its guide? Is SP 4 in accord with PPS1 and the Climate Change Supplement? Are the targets within SP4 realistic? Are they adequate? How do the targets within SP4 relate to other intended LDF documents?

- 2.1 The SP4 is prepared in line with the PPS 22 Renewable Energy para 8 which provides guidance that local development plans may contain policies that require a percentage of the energy to be used in new residential, commercial or industrial developments to come from on-site renewable energy developments and that such policies should take into account the viability of renewable energy installations and also should not be framed in such a way as to place an undue burden on developers, for example, by specifying that all energy to be used in a development should come from on-site renewable generation.

- 2.2 The SP4 is in line with the PPS1 Climate change companion which asks that in developing their core strategy and supporting local development documents, planning authorities should provide a framework that promotes and encourages renewable and low carbon energy generation. In particular, planning authorities should expect a proportion of the energy supply of new development to be secured from decentralised and renewable or low-carbon energy sources.
- 2.3 When setting the carbon emissions reduction targets and the renewable energy target, and in line with PPS 1 climate change supplement paragraphs 26 and 27, the Council has paid attention to local studies carried out for general assessment of availability and suitability of renewable technologies in Haringey and looked at sample development sites in Haringey to test the SP 4 policy targets through the Energy infrastructure Study (see paragraph 1.3). This study demonstrates that there are a range of energy efficient systems and renewable energy options available to developers. The Council considers the SP4 targets as realistic and adequate. The targets also relate well to the Council's aspirations to reduce carbon emissions by 40% by 2020.
- 2.4 The renewable energy target in SP4 provides continuity from the existing London Plan 2008 and mirrors the retention of this policy, albeit outside the main policy wording, within the revised London Plan (draft LP policy 5.7 pages 124). Haringey's 20% renewable energy on-site requirement in Haringey is supported by local evidence as set out in Haringey's Energy Infrastructure Study. The wording of the policy SP4 pays attention to the "viability" issues and provides sufficient flexibility for the provision of on-site renewable energy options in Haringey over the lifetime of the Plan. It has been caveated so will be used in the same way as intended in the London Plan – to drive developments with the ability to go further to do so. Also it is likely that in many cases the 44% reduction in CO2 emissions target will be partly met via use of renewables and therefore this target provides the means to push for more where appropriate.
- 2.5 The SP4 does not prescribe any particular renewable energy option. Renewable energy technologies are identified in the London Plan 2008 and the draft London Plan (page 125). In line with the London Plan, and Haringey's emerging DM DPD and the SDC SPD, assessment by developers on the most suitable and viable options should form part of energy statements accompanying planning applications.
- 2.6 The policy targets will be implemented flexibly taking into account the size of the development, viability, practicality and the emergence of new technologies. It should also be noted that the majority of housing sites from the housing trajectory that are likely to come forward over the next 15 years are over the major development threshold. More detail on how to apply policy SP4 will be provided in the Development Management DPD and the Sustainable Design and Construction SPD. The Core Strategy is a plan for the next 15 years, and the expectations for energy

standards is that they will get stricter over time including the tougher Building Regulations, and the Government's targets for Zero Carbon buildings.

- 2.7 44% reduction in carbon emission is considered to be a minimum standard to achieve. Targets higher than the ones set in SP4 are considered as part of the Energy Infrastructure Study, and for majority of the sites studied; this is found to be technically achievable. However, the viability test application to the SP4 targets through the Affordable Housing Viability study indicated that for the targets set in policy SP4 are the right targets with current assumptions and available technologies, and costs. The Council will test higher carbon reduction targets through the Area Action Plans, masterplans, and planning briefs where applicable.
- 2.8 For zero carbon targets, the Government expects this to be technically and financially feasible for most housing development by 2016 and non-domestic development by 2019.
- 2.9 If the Inspector agrees, for purposes of clarity, the Council is proposing a minor amendment: to delete paragraph 4.1.10, and create a new paragraph after paragraph 4.1.13 taking into account the text in 4.1.10 with expanded new text:

“Carbon reduction standards for residential buildings are expected to get stricter between 2011-2016 and for non-domestic buildings; the standard will be zero carbon by 2019. The Council may test higher carbon reduction targets through the Area Action Plans, and set further standards to be achieved in the Development Management DPD, Sites DPD in line with future national, regional and local evidence.

3. Issue 3.3

Does the CS 4.1.19 preclude the location of energy hubs in areas not cited? Sufficiently flexible?

- 3.1 The Core Strategy paragraph 4.1.9 does not preclude the location of energy hubs not listed in the 4.1.8, and shown on the indicative map Figure 4.1 on page 95. The ones shown are based on the Council's own assessment which indicated that due to the size of development, site characteristics and the possibility of linking with existing and potential heat demanding uses nearby, these sites could support the DE networks to come forward over the next 15 years. By flagging up these potential sites in para 4.1.9, the Council want to encourage developers with interest on these particular sites to consider the DE network options.
- 3.2 In line with SP4 and the Council will welcome other sites, opportunities and proposals to come forward through the development process. Improved information on the London Heat Map over the coming years, and the Council and its partners continued concerted effort for potential DE hubs are expected to help further in decision –making process for

such facilities. The Council is currently assessing viability and practicality of such hubs in relation to two sites in Haringey, and there is a cross-borough Upper Lee Valley Decentralised Energy Network feasibility study currently being carried out with LB Enfield and the LDA. Where assessments from such studies become available, these will be reflected in the emerging Sites DPD and the relevant Area Action Plans.

3.3 The Council will also work with the GLA to identify further sites for DE options and renewable energy generation where possible in line with the Mayor's forthcoming Mayoral forthcoming supplementary guidance cited in the draft London Plan. This guidance will aim to set out broad guidelines to assist Boroughs to define locations where stand-alone renewable energy schemes would be appropriate.

3.4 If the Inspector agrees, the Council wants to add a new paragraph to after 4.1.20 for clarification purposes:

"This list of sites identified in Figure 4.1 is not exhaustive. Council will welcome new sites, opportunities and proposals to come forward through the development process. Where assessments from other sources such as the Upper Lee Valley related energy studies become available, these will be reflected in the emerging Sites DPD and the relevant Area Action Plans. The Council will also work with the GLA to identify further sites for DE options and renewable energy generation where possible in line with the Mayor's forthcoming guidance cited in the draft London Plan. The guidance will aim to set out broad guidelines to assist Boroughs to define locations where stand-alone renewable energy schemes would be appropriate".

4. Issue 3.4

Is the historic significance of heritage assets recognised adequately by the CS?

3.4 The PPS 5 Planning for historic Environment was published when the Core Strategy Submission draft is prepared. The Council has taken into account the English Heritage (EH) comments to reflect PPS 5 adequately in the Core Strategy regarding historic building and climate change, and proposed minor changes to the Core Strategy (15/15/4.1). The EH was consulted on the minor changes. In addition, the EH has published a number of advice documents on improving the environmental performance of heritage buildings and the SP4 and the SP11 policies would not seek to duplicate these.

5. Issue 3.5

Does the CS make appropriate reference to the energy hierarchy (and the London Plan)?

5.1 See the response above in paragraph v, and para 1.2.

6. Issue 3.6

Are matters relating to climate change acknowledged adequately within the CS?

6.1 See the responses above in paragraphs ii, iii, v, vii, 1.2 and 1.3

7. Issue 3.7

Is a 20% renewable energy target justified and consistent with LP?

7.1 See the responses above in paragraphs 2.3 and 2.4

8. Issue 3.8

Is there a need to alter 4.1.17 to ensure effectiveness in terms of viability/practicality?

8.1 The policy SP4 asks developments to assess the potential for site-wide decentralised energy facilities or to investigate the feasibility of connecting to a nearby network. This is in line with the London Plan 2008 and the draft London Plan (2009). The policy is flexible in that it asks developers to create site-wide facilities or connect to existing networks if these options are shown to be viable and practical following technical and financial assessments. These options are for developers to assess. In line with the London Plan and the draft replacement London Plan, and the emerging Development Management DPD and the Sustainable Design and Construction SPD, such assessments should form part of energy statements accompanying planning applications. The type of information required from developers under this text relates to energy statements that are supported by the London Plan.

8.2 If the Inspector agrees, the Council propose a minor change for amending the paragraph 4.1.7 by shown below:

“Major developments should assess the practicality and viability of connecting to existing heating and cooling networks and the provision of site-wide Combined Cooling Heat and Power network, and communal heating and cooling systems.”

9. Issue 3.9

Does SP4 replicate unnecessarily Building Regulations and its intended changes?

9.1 The policy goes beyond the current version of Building Regulations, which is set as a minimum standard for the whole country. Reflecting the findings of the Energy Infrastructure study, land values and Haringey's Greenest Borough aspirations, a higher target has been set, which is in

line with the revised London Plan. If Building regulations proceeds as planned it will catch up and possibly supersede these targets but there is still much uncertainty given announcements over the past year and also there is an understanding that strong action is needed to meet the targets set by the Council and address the wider issues.