

Examination of Draft Revised Lambeth Local Plan 2020-2035

Inspector's Matters Issues and Questions: Statement on behalf of Grainger Plc (R068)

Matter 7 - Environment and Green Infrastructure

7.2 Decentralised Energy, Design and Construction:

Is policy EN3 (decentralised energy) justified and in accordance with national policy and the London Plan? In particular, is it appropriate for the policy to specify specific technologies as a requirement?

Draft Policy EN3 is an absolute requirement. It states that “*All major developments will be expected to connect to, and where appropriate extend, existing decentralised heating networks in the vicinity of the site, unless a feasibility assessment demonstrates a connection is not reasonably possible*”.

In its response to the Inspector's question, the Council says that its justification for Policy EN3 is to conform with the London Plan. However, this not the case as the London Plan does not require all major developments to connect or extend existing decentralised heating networks unless a feasibility assessment demonstrates that connection is not reasonably possible. The focus of the approved London Plan is likely all about minimising the carbon dioxide emissions, with Policy 5.2 setting out the energy hierarchy. As part of that hierarchy, Part D(c) does give district heating and cooling as an example of how to further reduce carbon dioxide emissions, alongside combined heat and power (CHP) as another example.

The Intend to Publish London Plan has a similar starting point with Policy SI 2 seeking to minimise greenhouse gas emissions, expand the energy hierarchy and require major development to be net zero-carbon, with at least 35% of the reduction beyond Building Regulations being on site, with any short fall being offset.

Policy SI 3 advocates energy masterplans for large-scale development locations and then for major development proposals, sets out a hierarchy for different types of communal low-temperature heating systems. The Panel Report into the London Plan EIP felt that was reasonable, but also stated “Equally, it is wise not to expressly rule out options such as combined heat and power under certain circumstances, given that technology may change over the period of the Plan.” Nowhere is there are requirement to connect into or extend existing decentralised heating networks.

Whilst such decentralised heating networks can help reduce CO2 emissions, there are already other technologies that can out-perform what can be achieved through an existing decentralised heating network. Development proposals that have come forward across London over the last year have demonstrated that with the de-carbonisation of the National Grid and substantial efficiency improvements in air source heat pumps, they are an example of a more efficient way of supplying the heating system, with the Mayor's own specialist energy team having agreed that such solutions can be the best way of minimising CO2 emissions.

Furthermore, it is not unreasonable to expect that new technologies will come forward during the plan period.

The need to reduce CO2 and improve air quality is a London wide and national issue, with there being no particular local circumstances in Lambeth which warrant its own separate policy. Draft Policy EN3 should therefore be deleted.