

RPS responses contained within the London Plan Supplementary Planning Guidance on Sustainable Design and Construction to the essential and preferred standards are in italics and blue below each standard.

Sustainable Design & Construction – London Plan SPG	
Energy Efficiency Section 2.3.2	
Essential Standards	Mayors Preferred Standards
Carry out an energy demand assessment	All developments to demonstrate that consideration has been given to the following ranking method for heating and where necessary for cooling systems and should incorporate the highest feasible of the following options:- solar water heating; then - combined heat and power/trigeneration, preferably fuelled by renewables; then - community heating. New developments should always be connected to existing community heating networks preferably fuelled by renewables where feasible
<i>The Sustainability Appraisal was only able to take information available from the draft of the Energy Strategy (August 8th) into account when it was written.</i> <i>The energy assessment submitted with the application has now been updated and is included as Appendix 1 to this letter.</i>	<i>The Energy Strategy uses a 'variant' Energy Strategy which has followed the GLA energy hierarchy; reduce energy use, use energy efficiently, on-site renewable generation. In section 6 the Energy Strategy highlights on page 21 that the Energy Strategy explores a number of options which are compliant with the policy framework together with an alternative strategy which is in line with the spirit of policy, but which achieves significantly greater CO₂ reduction than the compliant options.</i> <i>Please also see response no. 28 from the Sustainability Appraisal.</i>
Maximise energy efficiency	Wherever outdoor lighting or other electrically powered street furniture is proposed on site, it should be solar powered and minimize light lost to the sky
<i>Expanded Response no. 26 from the Sustainability Appraisal: Energy efficiency measures have been incorporated through the specification of energy efficient building services (such as the air to air heat pumps which reduce emissions by up to 5% compared to a conventional gas fired boiler in the resources centre) and including energy efficient lighting.</i>	<i>Outdoor lighting will be energy efficient and controlled for the presence of daylight. The external lighting strategy at present does not include solar powered lights and any further consideration of this issue would need to take account of safety requirements.</i>
Major commercial and residential developments to demonstrate that consideration has been given to the following ranking method for heating and where necessary cooling systems: - Passive design - Solar water heating; then - Combined heat and power for heating and cooling (i.e. trigeneration) , preferably fuelled by renewables; then - Community heating and cooling; then - Heat pumps; and then - Gas condensing boilers.	Lighting, heating and cooling controls should enable services to operate efficiently under different loadings and allow for localized control
<i>The project has a variant Energy Strategy as previously described, which achieves a better CO₂ reduction than the compliant alternative.</i>	
Wherever on site outdoor lighting is proposed as part of a development it should be energy efficient, minimising light lost to sky	Major developments should be zero carbon emission developments (ZEDs)
<i>Outdoor lighting will be energy efficient and controlled for the presence of daylight.</i>	<i>The Energy Strategy does not propose the development to be zero carbon but does propose to deliver major emissions reductions through funding a new community heating system that utilizes the unused heat recovery from the SELCHP waste incinerator to supply the existing housing estates in Southwark and to the north of SELCHP.</i>
Carbon emissions from the total energy needs (heat, cooling and power) of the development should be reduced by at least 10% by the onsite generation of renewable energy.	Major developments should make a contribution to London's hydrogen economy through the adoption of hydrogen and/or fuel cell technologies and infrastructure

<p>Please see response number 29 in the Sustainability Appraisal which draws from the submitted energy strategy:</p> <p><i>'The 20% renewable energy on site target has been demonstrated by the energy strategy to not be feasible. A variant energy strategy proposes funding for a new community heating system utilising unused heat from the SELCHP waste incinerator which will offset 90% of the total CO2 emissions from the IWMF facility. This is proposed as providing a better overall solution which is innovative and offers the potential to improve upon the type of solution which would result from simply adhering to the published policies.'</i></p>	<p><i>It is unlikely that hydrogen infrastructure is appropriate for this site and its intended use within the development footprint. However, Veolia could keep hydrogen and fuel cells under review in regards to their operational vehicle fleet within London.</i></p>
Water Efficiency 2.3.4	
<p>Residential developments to achieve average water use in new dwellings of less than 40m3 per bedspace per year (approximately 110 litres/head/day)</p>	<p>Residential developments to achieve average water use in new dwellings of less than 25m3 per bedspace per year (approximately 70 litres/head/day)</p>
<p><i>N/A this development is not residential</i></p>	<p><i>N/A this development is not residential</i></p>
<p>100% metering of all newly built property</p>	<p>Use of greywater for all non potable uses</p>
<p><i>It is intended that water meter(s) in the mains water supply will be specified as appropriate.</i></p>	<p><i>The specification includes provision for water recycling within the MBT element and provision for greywater recycling for toilet flushing in the Resources Centre and vehicle wash.'</i></p> <p><i>It may be possible to use the greywater for washing of HGVs delivering waste to the IWMF and mobile heavy plant e.g. bucket loaders.</i></p> <p><i>Fittings will be specified to reduce consumption where possible.</i></p>
Natural Environment & Biodiversity 2.6.3	
<p>No net loss of biodiversity and access to nature on the development site</p>	<p>Net gain of biodiversity and access to nature on the development site</p>
<p><i>With regards to flora, there are considerable ecological enhancements being made to the site, including planting of wildflowers and there will not be a negative change in the value of the site.'</i></p> <p><i>As noted in responses to questions 46 and 47 and 48 in the Sustainability Appraisal the development proposals incorporate measures to encourage bats and stag beetles on site (despite there being no previous use). As noted in the ecology chapter of the ES, Bird boxes are also to be provided which are anticipated to significantly increase the potential for house sparrows.</i></p> <p><i>There is not understood to be any formalised access to nature on the development site at present, therefore this cannot be lost as a result of the development.</i></p>	<p><i>Please see responses to the Essential standards (left) in which measures are taken to enhance biodiversity.</i></p> <p><i>Access to nature has not been included specifically within the development proposals although an Environmental Action Plan will be produced. Further consultation about the management of the scheme once operational would be required if 'access to nature' is to be addressed specifically.</i></p>
<p>Reduction in areas of deficiency in access to nature</p>	
<p><i>Policy 3D.14 of the London Plan (Consolidated with Alterations since 2004) published February 2008 seeks to improve Londoners' access to nature. The policy states that boroughs should identify deficiency areas in access to nature and the opportunities for addressing them.</i></p> <p><i>The site is identified as being in an area as deficient in access to nature by the London Borough of Southwark. As described in the ecological chapter of the Environmental Statement and the Sustainability Appraisal a number of ecological enhancements are being undertaken as part of the proposals. There is no public access to the site at present and public access will be increased as part of the proposals in that the site will be brought into a use where the public will use the IWMF facilities. Direct access to the ecological enhancements on site, is, however, a potential security issue. Visitors will have access to the Resources Centre which may act as a tool to impart knowledge about the ecology on site. Any further access is a management issue which cannot be determined fully at this stage but which in any extent need to be restricted / managed to prevent damage to these areas.</i></p>	