

Low Carbon Development

Action Plan

Low Carbon Development Action Plan

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1. Purpose and scope

The purpose of this action plan is to achieve the Low Carbon Development ambition set out in London Councils [Joint Statement on Climate Change](#) with TEC and LEDnet, to 'Secure low carbon buildings and infrastructure via borough planning', by 2030. This action plan sets out a pathway for all borough Local Plans to have policies and guidance that support low carbon development, mitigating against carbon emissions and adapted to climate change. An annual increase in the proportion of low carbon affordable housing starts and completions within GLA, housing association and borough programmes will be a clear measure of success.

The action plan has been developed collaboratively by London boroughs, with support from London Councils, Planning Officers Society (POS) – London, the Association of London Borough Planning Officers (ALBPO) and experts from the built environment.

LB Hackney is the lead borough for this plan for two years, and progress will be reported back to London Councils' Transport and Environment Committee (TEC) on at least a six-monthly basis (see Section 6). This plan is designed to support all boroughs to achieve the Low Carbon Development ambition, whilst recognising that requirements and resourcing will vary from borough to borough.

2. Introduction

2.1. London boroughs' action on climate change

Since 2019, 28 boroughs have declared a climate emergency, together with more than 230 local authority declarations nationwide. The Climate Change Committee has recognised that local authorities' 'leadership role in partnerships and with the public places them at the heart of the climate conversation and in

developing and replicating local solutions’, and that ‘Around a third of the UK’s emissions are dependent on sectors that are directly shaped or influenced by local authority practice, policy or partnerships.’¹

Recognising the need for coordinated support to boroughs climate change ambitions, TEC and the London Environment Directors’ Network (LEDNet) met in November 2019 to discuss climate change action and the development of shared priorities. There was a consensus on the urgency of climate change and the need to act promptly and collaboratively, and in December 2019 London Councils adopted the Joint Statement on Climate Change.

The Joint Statement on Climate Change identifies seven key [climate programmes](#) that boroughs will jointly deliver. This action plan focuses on the second, identified as Low Carbon Development, but synergies exist with all the others to act on climate change.

2.2. National and Regional Policy Context

The Government has set a national target of reaching net zero emissions by 2050. In January 2022, the Mayor of London announced an accelerated target for net zero by 2030. A revised pathway to net zero lists four options including the adopted *Accelerated Green* pathway. Achieving this target will require:

- Nearly 40 per cent reduction in the total heat demand of our buildings, requiring over 2 million homes and a quarter of a million non-domestic buildings to become properly insulated
- 2.2 million heat pumps in operation in London by 2030
- 460,000 buildings connected to district heating networks by 2030

There is a complicated planning framework in the UK that impacts on achieving low carbon development. The National Planning Policy Framework (NPPF) and the London Plan both support low carbon aims, but there is a sense of uncertainty about the strength of the planning system due to Government proposals and recently implemented changes.

National

During the Covid pandemic, London boroughs and other stakeholders responded to government consultations on a wide range of major planning reforms, including the White Paper ‘Planning for the Future’ which seeks to replace the existing planning system in England, established in 1947. These reforms have the potential to significantly impact on the deliverability of this action plan and low carbon development objectives.

Permitted Development Rights

The government has introduced a raft of changes to permitted rights development in the last few years. This increased flexibility in the planning system has introduced less control in the planning system to require the adoption of climate mitigation and adaptation measures.

NPPF

The NPPF, which sets out the framework for future development and infrastructure, supports the move to a low carbon future through planning.

¹ 2020, *Climate Change Committee, Local Authorities and the Sixth Carbon Budget*, [Local Authorities and the Sixth Carbon Budget - Climate Change Committee \(theccc.org.uk\)](https://www.theccc.org.uk)

Para 152 of the NPPF sets out that:

‘The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure. ‘

London Plan policy

The London Plan 2021 has a broad range of policies around climate change including Policy SI 2 Minimising greenhouse gas emissions, Policy SI 3 Energy infrastructure, Policy SI 4 Managing heat risk, Policy SI 5 Water infrastructure. Policies mainly focus on reducing greenhouse gas emissions from operational energy on major development, but also introduce requirements to reduce embodied carbon and address circular economy for referable developments.

The Future Homes/Buildings Standard

Building regulation changes in the new Future Homes/Buildings Standards are scheduled to be introduced in 2025. Feedback on consultation on the draft Future Homes Standard indicated that the proposals did not go far enough. In the 2021 update to Part L (fuel and power) and Part F (ventilation), the Government has allowed local authorities to set their own targets for carbon emissions and to retain the Fabric Energy Efficiency Standard (for extensions etc).

New homes will have to produce around 30% less carbon emissions from 2022 and there will be new regulations to mitigate the risk of overheating (Approved Document O). In existing homes, standards have been raised to reduce energy use and carbon emissions during home improvements.

2.3. Overview of Low Carbon Development

The built environment accounts for 38% of global Greenhouse Gas emissions (Riba, Built for the Environment 2021)

Around 10% of the UK's carbon dioxide emissions are directly associated with construction in the UK (UK Green Building Council). This includes the CO₂ generated through the entire building process (<https://www.ukgbc.org/climate-change-2/>)

It has been identified that the decarbonisation of the built environment is a key way that Local Authorities can effect change in climate terms (Local Authorities and the Sixth Carbon Budget, Climate Change Committee, 2020). An essential part of decarbonisation of the built environment is in producing buildings now with reduced energy needs and radically reduced carbon emissions. Low carbon development can be defined as buildings and infrastructure that are designed, utilising sustainable materials, energy and construction practices, to a much reduced total lifetime carbon footprint. Where traditionally only operational carbon had been the focus of efforts, with accelerated aims towards reaching zero carbon, reducing embodied carbon and bringing down emissions at all the life cycle stages of the building is essential. The objectives of the Low Carbon Development Action Plan are a response to the carbon emissions that are intrinsically linked to building materials, the construction industry and new development.

Climate mitigation and adaptation measures create more efficient and less environmentally impactful buildings. Climate change in London is impacting most strongly through flooding events and overheating

(Resilient London - Confronting Climate Change, 2021). Making new buildings climate change resilient means that they will be able to withstand the increased heat and more sudden heavy rain events without additional energy requirements. The orientation, design, and energy efficiency of buildings can minimise the need for energy to operate a home. Green infrastructure can be provided which brings shade and coolness against the urban heat island effect. SuDS can be used to prevent flooding and retain water for later use. These adaptations work alongside new technologies and construction methods coming forward that are essential to meet low carbon aims.

In the UK, in the absence of clear Government policies for creating low and zero carbon development, the private sector and local government are providing ways to move forward. There is growing support in the private sector for low carbon development. The understanding is that low and zero carbon in new builds is a matter of when, rather than if. Private businesses can sign up to industry standards such as Better Buildings Partnership (BBP) Climate Commitment and the World Green Building Council's (WGBC) Net Zero Carbon Buildings Commitment (RICS website).

A key issue with a significant investment/cost for Councils at present is retrofitting existing buildings to make them low carbon, and this is addressed through Retrofit action plan. The central aim of this action plan is to significantly reduce and, where viable, bring to zero, carbon emissions in new development across London. This is much more achievable if well planned at the design stage of new development than at a later date post construction. By ensuring that the buildings being built now are as low carbon as they can be, and ready for future advances in technology, this avoids the need to retrofit and limit expenditure for councils in the future. This underlines the need to create strong, clear, viable policy requirements for low carbon and zero carbon in new development.

3. Action plan development

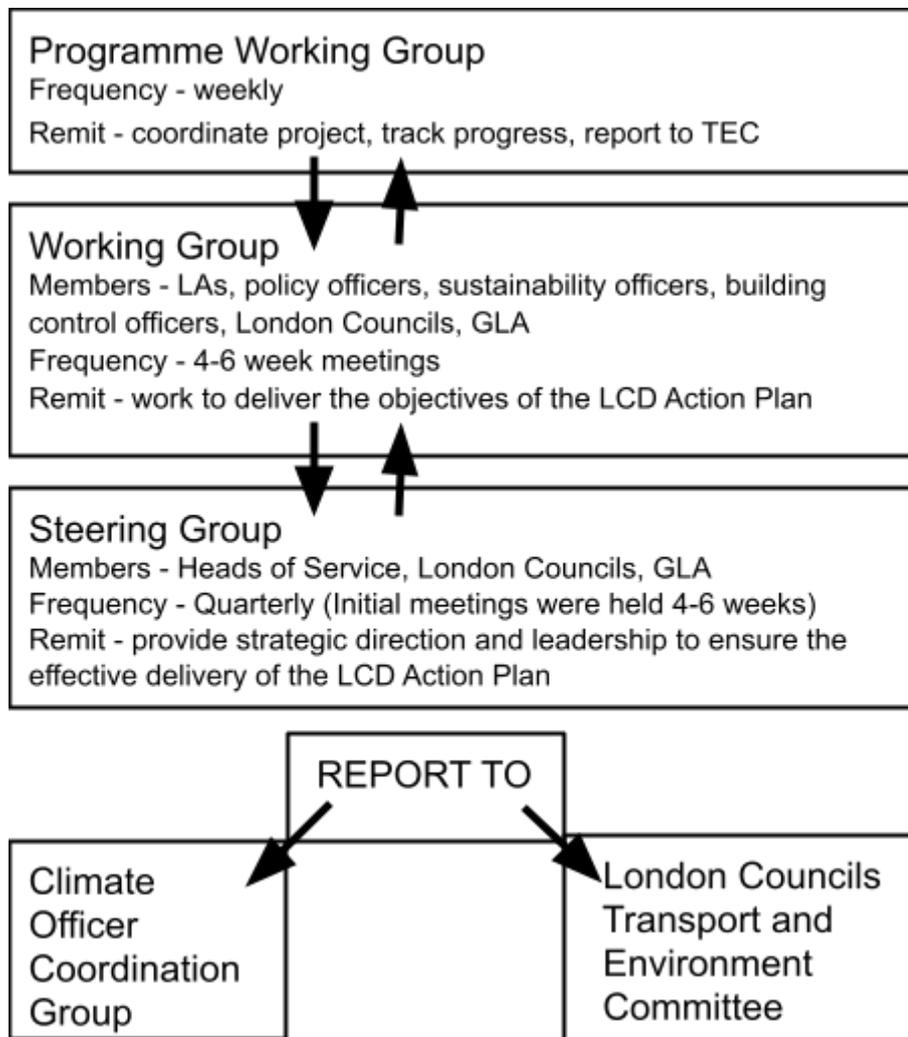
LB Hackney was appointed as lead borough for this ambition at the December 2020 TEC meeting. LB Hackney will fulfil this role for at least two years, and will:

- Fine tune and approve the action plan developed from the objectives and activities identified by the Low Carbon Development Working Group and ensure that it is commensurate with this ambition.
- Develop a two-year work plan
- Ensure that appropriate governance structures and resourcing exists to support delivery of the work and action plan
- Oversee the effective delivery of the action plan
- Support advocacy activities that can secure resourcing and a supportive policy framework – at local, regional and national levels – that supports the aim of the action plan
- Report back to the LEDNet climate cluster on at least a quarterly basis
- Report back to London Councils TEC on at least a six-monthly basis

3.1. Governance

A collaborative governance structure was agreed in September 2021.

Figure 1 – LCD Governance Structure



There were 13 Local Authorities in the working group at the outset, with additional members joining as the programme has developed. There are seven in the steering group. The working group and steering group represent a range of inner and outer London boroughs, with the political spectrum well represented. London Councils and the GLA attend both groups.

The two groups work in different, complimentary ways. There is a wide range of knowledge in the working group, bringing together expert knowledge from policy, building control and sustainability officers. The Steering group members have a strategic understanding of planning, and a wider understanding of the local authority systems in place.

Knowledge Partner

Brunel University has become the Higher London partner for the low carbon development programme, and will attend Steering Group meetings. This supports the delivery of the action plan, ensuring that the steering group is aware of the best available evidence and data. At the same time, the higher education partner is able to demonstrate impact and support decisions at the forefront of climate action in London, supporting their role as local civic leaders. There was great interest in the action plan from participants involved in the Higher London partnership and there will be opportunities to invite other members to working group meetings.

3.2. Discussion/Engagement to date

Discussion began in April - June 2021 on the scope of the work and the governance structure.

To support the first action set out in the action plan, a short Questionnaire on low carbon development in Local Plans was sent out in June 2021 via the ALBPO mailing list. A more detailed questionnaire was further developed and disseminated via the London Environmental Coordinators Forum in July 2021.

The steering and working groups were established in September 2021. To progress in agreeing the action plan framework, there have been five meetings of the Working Group, held on the 13th October, 15th November, 7th December, 24th January 2022 and 24th February 2022. Four meetings of the Steering Group took place on 18th October, 17th November, 15th December and 3rd March 2022.

Discussion has highlighted:

- Building control regulations need to be understood and factored into Low carbon aims
- Increased green infrastructure on buildings interplays with building regulations, particularly around fire
- Conservation - how better Low Carbon efficiencies need to be achieved
- National Policy limitations in areas including permitted development
- The Crossover with the retrofit programme - the Planning system needs to support retrofit
- Carbon offsetting - carbon offset pricing and onsite delivery
- The increased need to move from a low carbon to a zero carbon approach
- Delivery models and shared learning
- The push to move from operational carbon emission assessments to embodied carbon
- The need for stronger national policy
- Viability and costs for end users and housing delivery
- Balancing affordable housing, design and low carbon aims

Wider engagement with other action plan programmes and additional built environment experts has begun. The retrofit programme has been presented to the steering group and there will be ongoing discussion with that programme. There has been an initial meeting to discuss synergies with the ReLondon circular economy work. An introduction to London First has created an excellent opportunity to connect with businesses in London, and has the potential to provide in kind support and data to the programme.

3.3. Objectives and Principles in the Action Plan

The objective of the action plan is to: Secure low carbon buildings and infrastructure via borough planning, by 2030.

It became apparent through the working group and the steering group that there is broad interest and support within local authorities for creating a stronger, clearer framework around low carbon. Particular issues identified include the fragmented approaches across different councils, conflicts within the planning and building control systems and the lack of evidence on viability around low carbon and zero carbon outcomes. The action plan has distinct areas of work that have been split into four key areas:

1. Collaboration on policy making and guidance

Low and zero carbon development can be achieved where evidence and policy is robust. This workstream establishes where and how policy can be built on to create the right outcomes across London. Bringing together best practice, effective guidance and exemplar schemes to encourage developers to undertake low carbon development.

2. Strengthening delivery of low carbon buildings

Ensuring delivery of an increasing number of buildings that are low and zero carbon, of good design and contribute towards affordable housing is a key outcome of this programme. The action plan is undertaking work to see if standards across all local authorities would help with this, clearly indicating to developers that this is required across London. Measurable, clear requirements, effective monitoring and strong national policy which supports low carbon delivery are key steps.

3. Using innovation to make low carbon more achievable

The cost of low carbon and zero carbon delivery on-site can be a barrier to implementation. Research and evidence on the viability of low carbon is essential to underpin this action plan. The programme will monitor technological advances and evaluate how low carbon policies can sit alongside affordable housing need.

4. Increasing training and understanding within all Councils

Low carbon and zero carbon requirements in the built environment is of increasing importance in a planning context. Increased knowledge and upskilling is needed within local authority planning departments to support low carbon aims. This upskilling needs to be replicated across all council sectors and across all levels of council, including councillors. This is particularly important within direct housing delivery streams under council control.

4. Low Carbon Development Action Plan (2022 – 2030)

Collaborate (on policy making and guidance)

Objective	Milestone	20 22	20 23	20 24	20 25	20 26	20 27	20 28	20 29	20 30
1. Develop a robust evidence base to enable all boroughs to adopt Local Plans, policies and guidance which support the delivery of low carbon, climate-adapted development and lead to climate resilience	1a Audit of Local Plans completed, including gap analysis and monitoring of implementation									
	1b Model low carbon policies developed									
	1c Develop a common and consistent evidence base for low carbon policy development and for pooling the commissioning of consultants									
	1d Explore ideas and opportunities to secure lower carbon and net zero developments from developers									
2. Support boroughs to adopt measures which promote low carbon, climate-adapted development amongst developers, landowners and investors	2a Publish best practice guides for LPAs to develop policy which reflects the unique circumstances of their borough (including best practice on engagement with developers, landowners and investors)									
	2b New 'carbon award' established									
3. Boroughs simplify how planning and building regulations are applied across the capital, establishing pan-London approaches where these offer benefits	3a Scoping of Pan-London approaches completed									
	3b Adoption of pan-London approaches by boroughs where appropriate									
	3c All boroughs progress pilot/exemplar development schemes which showcase the potential for and benefits of low carbon development across London									

Strengthen (delivery)

Objective	Milestone	20 22	20 23	20 24	20 25	20 26	20 27	20 28	20 29	20 30
4. Increase the number of developments complying with policy and delivering on-site carbon savings - compliance and close the 'performance gap'	4a Development of decision-making best practice and guidance for boroughs completed, including guidance on heritage assets and relationship with building control									
	4b Boroughs take up new decision-making best practice and guidance									
5. Boroughs adopt agreed Performance Indicators (PIs) and London-wide performance targets and participate in regular data collection and reporting to monitor effectiveness of programme	5a Establish PIs to monitor effectiveness of low carbon policies									
	5b Boroughs adopt programme PIs and commence ongoing collection and reporting									
6. Effective lobbying to achieve coherent national policy reforms which facilitate delivery of the action plan	6a Consultation responses submitted									
	6b Key lobbying opportunities taken up									
	6c Keep a watching brief on national and regional policy changes and respond in a timely manner									
	6d Positive national reforms achieved									

Innovate

Objective	Milestone	20 22	20 23	20 24	20 25	20 26	20 27	20 28	20 29	20 30

7. The programme is underpinned by research which effectively supports lobbying and policy development	7a Research on new technology, viability and/or future building management completed										
	7b Research on safe use of sustainable, combustible materials and guidance on relationship between planning and building control										
8. Boroughs adopt community engagement measures which promote low carbon, climate-adapted development amongst residents and local communities	8a Community engagement guidance published										
	8b Analysis of University of East Anglia 'soft metrics' data completed										
	8c Energy costs matrix for residents published										
	8d Review of marketing options for low carbon credentials of open market sales completed										

Upskill

Objective	Milestone	20	20	20	20	20	20	20	20	20
		22	23	24	25	26	27	28	29	30
9. All boroughs increase their capacity and training and explore opportunities to increase resources to support the overall programme	9a Review of options for increasing Planning/Building Control capacity completed, including private sector resources, and initiatives progressed									
	9b Major training programme for Members and officers on low carbon, climate-adapted development completed									
	9c Low carbon, climate-adaptation development skills included in boroughs' training programmes and skills academy curriculum									
	9d Training on LPA monitoring and use of IT innovation									

5. Key issues and risks

The key ongoing risks have been scoped out in the risk matrix below.

Risk	Likelihood 1 = low probability, 5 = high probability	Impact 1 = Low impact, 5 = high impact)	Mitigation
Unable to achieve national policy asks, with a particular risk posed by the Planning White Paper.	3	3	Major reforms of both planning and Building Regulations ongoing, these reforms may well not deliver positive change, particularly given the Planning White Paper proposals and the serious risk that the planning and building regulation changes will not be integrated effectively, leading to anomalies and negative outcomes. The action plan includes a particular focus on research and lobbying aimed at achieving positive national policy outcomes.
Unable to persuade strategic partners to collaborate, in particular the GLA given its strategic planning role for London	3	3	The GLA is a key strategic partner and has been involved in the working group and steering group. The London Plan and the associated Planning Guidance documents (which are currently being prepared) provide a positive framework. However, there is a risk that opportunities to integrate this programme with the revisions to the GLA Planning Guidance will not be fully realised given timescales.
Different approaches pan London across councils may hinder collaboration	4	3	The Local Plans audit will identify policy gaps and the subsequent 'matching process' will enable boroughs to address gaps by calling on proposed policy development work to enhance and standardise local policies, including via the adoption of pan-London approaches.
Viability - costs of implementing low carbon policies	4	4	The GLA is updating guidance on viability and provides reference to low carbon developments. This work would need to be integrated with the recent work on updating its low carbon policy.
Unable to adequately staff the programme, particularly given existing under-resourcing of PLanning and Building control departments.	4	4	The activities in the action plan give rise to the need for increasing staffing levels, improved training and exploring greater use of Public Practice. However, this risk will be difficult to mitigate given the financial pressure on boroughs and the government's increased move towards PDR, where fees are particularly low.

Finance and Funding - Unable to obtain sufficient funding to deliver identified programmes/projects	4	4	The activities in the action plan include a substantial programme of research, policy development and other initiatives which will require funding. The approach taken by the Lead Boroughs to implementation will be important, for example if a wide range of boroughs can be recruited to lead on various action plan items, this would potentially reduce the funding required.
Unable to secure agreement on Cabinet responsibilities and the sub-division/integration of work within different borough departments, in particular Planning and Building Control	3	3	Boroughs operate diverse arrangements for the political and management oversight of this area, in particular the level of integration of these functions with Climate Change and wider environmental functions. The Local Plans audit will assist in understanding the degree of divergence within authorities and the adoption of more standard policies and consistent PIs will help reduce the impact of this risk.
Evidence and data are not sufficiently robust	3	3	The action plan includes a number of activities aimed at defining 'net zero carbon' and clearly establishing measures which define 'what success looks like'. The Planning London Datahub provides a good opportunity for the collection and monitoring of data and PIs. Further work will be undertaken to establish clear and comprehensive PIs that can be utilised across Local Authority planning departments.
Unable to secure effective collaboration across different climate programmes with shared objectives.	3	3	This risk has been clearly identified and mitigation put in place, in particular via the cross-cutting governance arrangements and cross-referencing of the seven action plans. Nevertheless, this remains a risk and there will need to be diligence throughout implementation.
Unable to secure cross-borough engagement with the action plan	3	3	Boroughs have differing Local Plans at different stages of development and cross-borough working in this area is limited. A key theme in the action plan is to reduce complexity in the system, by adopting pan-London approaches for which boroughs have indicated support, but also expressed reservations. Therefore, borough engagement at a senior decision-making level will be crucial. The Steering Group includes Heads of Service from across the LA political spectrum.
Public sector services are rapidly moving towards becoming zero carbon – concerns	3	3	It is anticipated that the potential for resident engagement is significant provided that residents are involved throughout, e.g. the cost and simplicity of using new heating systems and the wider benefits in

<p>about private individuals being able to match this and the cost to them.</p>			<p>terms of fuel poverty, health and well-being etc are promoted.</p>
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6. Monitoring, reporting and review

Monitoring

The lead borough for the Low Carbon Development action plan is responsible for monitoring, reporting and reviewing the action plan. The Low Carbon Development programme will provide regular updates to Climate Officers Group and six-monthly reports on progress to TEC.

Reporting

The Low Carbon Development programme will use a common dashboard approach that gives an overall red/amber/green rating for each milestone in the work plan, and a subset of RAG ratings for each activity, based on whether they are on track, completed or behind schedule.

Ahead of each working group meeting, the action plan activities will be assessed against the timelines identified, with each action RAG rated. For actions that are indicated behind schedule the Working Group will discuss mitigation options and seek to implement them before the next working group meeting. If the mitigation required is more significant, this will be referred to the Steering Group as appropriate.

Review

Discussions for developing a second two-year work plan will begin in Spring 2023 for approval by Summer 2023. In Summer 2023, the lead borough for the next two year work plan will be decided via a simple selection process.

Annexes

1. Terms of reference for Low Carbon Development Working Group

Annex 1

Low Carbon Development Action Plan Working Group – Terms of Reference

Background

In November 2019, London Councils agreed a Joint Statement on Climate Change that identifies seven key [climate programmes](#) that boroughs will jointly deliver, of which the second is the **Low Carbon Development Action Plan**.

The purpose of the Low Carbon Development action plan is to achieve the ambition set out in London Councils [Joint Statement on Climate Change](#), to 'Secure low carbon buildings and infrastructure via borough planning', by 2030. The goal is for all borough Local Plans to have policies and guidance that support low carbon development and adaptation to climate change, and for an annual increase in the proportion of low carbon affordable housing starts and completions within GLA, housing association and borough programmes.

In October 2020, LB Hackney was appointed as lead boroughs for Low Carbon Development, with a remit to lead the delivery of the programme, ensure that boroughs and other partners are engaged and to report back to London Councils Transport and Environment Committee.

LB Hackney has adopted this plan and will lead its delivery and adoption in partnership with other boroughs and external organisations, such as the GLA.

Role/Purpose

The Low Carbon Development Working Group ('the working group' henceforth) will work to deliver the objectives of the Low Carbon Development Action Plan.

Term

This Terms of Reference is effective from 13th October 2021 and will be ongoing until terminated by agreement between the parties.

The time period commitment from each Working Group member is for two years, with the opportunity to recommit on 13th October 2023

Membership

The Working Group will comprise:

Katie Glasgow, Strategic Planning Manager, Hackney

Rachel Weaver, Strategic Planning officer, Hackney

Nick Smith, Principal Policy Officer – Housing and Planning, London Councils

Rhian Williams, Senior Strategic Planner, GLA

and officers from:

- Tower Hamlets

- Kingston
- Lambeth
- Hammersmith and Fulham
- Barnet
- Camden
- Enfield
- Islington
- Barking and Dagenham
- Hounslow
- Newham
- Southwark
- Greenwich
- Kensington & Chelsea

Roles and Responsibilities

The Working Group is accountable for:

- delivering identified outputs of the Low Carbon Development Action Plan
- fostering collaboration
- removing obstacles to the successful delivery of the Action Plan
- maintaining at all times the focus of the Working Group on the agreed scope, outcomes and benefits
- monitoring and highlighting the factors outside the Working Groups control that are critical to its success.

The membership of the Working Group will commit to:

- attending all scheduled Working Group meetings and if necessary nominating a proxy
- wholeheartedly championing the network within and outside of work areas
- sharing communications and information across all Working Group members
- making timely decisions and taking action so as to not hold up the project
- notifying members of the Working Group, as soon as practical, if any matter arises which may be deemed to affect the development of the Action Plan

Members of the Working Group will expect:

- that each member will be provided with complete, accurate and meaningful information in a timely manner
- to be given reasonable time to make key decisions
- to be alerted to potential risks and issues that could impact the project, as they arise
- open and honest discussions, without resort to any misleading assertions
- ongoing 'health checks' to verify the overall status and 'health' of the Action Plan.

Meetings

All meetings will be chaired by London Borough of Hackney

Decisions made by consensus (i.e. members are satisfied with the decision even though it may not be their first choice). If not possible, the Working Group chair makes the final decision.

Meeting agendas and minutes will be provided by London Borough of Hackney , this includes:

- preparing agendas and supporting papers
- preparing meeting notes and information.

Meetings will be held every 4-6 weeks .

If required subgroup meetings will be arranged outside of these times at a time convenient to subgroup members.

Amendment, Modification or Variation

This Terms of Reference may be amended, varied or modified in writing after consultation and agreement by Working Group members.