

Earl's Court and West Kensington Opportunity Area Joint Supplementary Planning Document

CONSULTATION RESPONSES SCHEDULE: ENERGY

Chapter 11: Energy Strategy

ID	First Name	Surname	Organisation Representing	Chapter comments relate to	Section comments relate to	Comment Made	Officer Response
550	Malcolm	Spalding	Earl's Court Society	11		All development from day one should meet zero carbon, before the deadlines of 2016 and 2019	No change necessary. The environmental targets for achieving zero carbon in the revised draft SPD are in accordance with the London Plan. Bringing forward these timescales would involve creating new policy, which cannot be done through an SPD.
551	Malcolm	Spalding	Earl's Court Society	11	Key Principle EN3	EN3 [italics] "payback" is in energy terms, not just financial. All methods considered should include calculation of offsite energy costs. ie for biomass, fuel used in transportation and possible preferable uses of the land used to grow the fuel [end italics]	Change proposed. ENE3 and Para 11.15 will be revised to require 'whole life' predictions of carbon emissions to be included in energy assessments.
1257	Jenny	Montefiore		11		SERVICES Will the electricity Grids be able to cope? Do we have the resources and services in place to deal adequately with all these people .	No change necessary. The Energy Strategy requires all buildings in the OA to reduce CO2 in accordance with the energy hierarchy of use less, supply energy efficiently and using renewable energy. All three of these requirements have the potential to reduce the amount of energy from the grid.
1606	Claire	Craig	English Heritage	11	ENE2	In addition, English Heritage: - Welcomes Key principle ENE2 concerning decentralised energy provision that could serve the surrounding area on page 149. We consider such provision to be a significant way of ensuring that the environmental performance of heritage building stock is appropriately upgraded. We would welcome prioritisation of conservation area properties for networking should this type of infrastructure emerge successfully; and HOUSING	No change necessary. There are currently no CAs designated in the OA. Should the capacity exist to extend the decentralised energy system outside of the OA boundary, this should not be limited to buildings within CAs but based on the nature of area, heat and energy demand and extent of existing decentralised energy provision. However, the SPD does not preclude buildings in CAs being given priority, as there are already 19 CAs surrounding the OA.
1633	John	Drake	Campaign to Protect Rural England	11		v) The housing should have the highest 'Bream' rating which includes thermal solar panels and photo voltaic cells in addition to any estate based heating such as CCHP.	No change necessary. The SPD must supplement existing policy and therefore must be consistent with the environmental standards in the London Plan and Borough Core Strategies. The SPD should not specify the technologies to be required, as this should be considered holistically through a site wide energy assessment (required in accordance with Key Principle ENE4).
2093	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	11	ENE1	The wording is inflexible. It should be amended to require that each phase of the development should 'seek to' meet the carbon reduction target set out in the Mayor's London Plan.	No change necessary.. ENE1 is in accordance with the London Plan Policy 5.2B, which states that "...to ensure that major developments meet the following targets ..."

2094	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	11	Para 11.12 - 11.14	The revised draft SPD should not be specific as to the manner in which energy centre (s) will be delivered and who will be the delivery party.	<p>No change necessary.</p> <p>The requirements for DE and associated district heat network are based on the Energy Study (2011) and LBHF's and RBKC's borough-wide heat mapping studies. Given the scale of development in the OA, it is important that development contributes to the creation of the DE and associated heat network. The requirements in 11.14 are needed to ensure that the system is delivered, is future proofed and is able to be connected into similar systems in the future. The SPD states that the delivery party will be an ESCO or MUSCO or similar, which provides flexibility.</p>
2095	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	11	ENE3	It is inappropriate and impractical to require that on site renewable energy is 'required to meet' any shortfall in achieving carbon reduction targets. The wording should be revised to provide appropriate flexibility in this respect.	<p>No change necessary.</p> <p>In accordance with the London Plan Policy 5.2A development should minimise carbon dioxide emissions in accordance with the energy hierarchy, of using less energy, supply energy efficiently and using renewable energy. Carbon dioxide emissions not reduced through the first two elements of the hierarchy will need to be reduced through on-site renewable energy. Para 11.18 provides for 'allowable solutions' should the carbon reduction targets not be met on site.</p>