

Combined Heat and Power – Policy and Practice in Lewisham

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Introduction

This note provides a brief overview of the Council's Planning Powers in relation to communal heating systems. As requested It will cover the:

- Policy framework used by the council;
- Process for considering and granting planning permission;
- How we evaluate energy assessments;
- How we monitor the implementation of the heating systems granted planning permission.

Planning Policy

The legal planning system is that decisions on planning applications should be based on policies in the development plan unless other material considerations outweigh these.

National, Regional and Lewisham Planning Policy all promote decentralised energy provision.

The development plan for Lewisham comprises the London Plan 2011, The Core Strategy 2011; and other adopted Local plans.

The London plan and Lewisham Core Strategy contain policies relating to decentralised energy. London Plan policies 5.4, 5.5, 5.6 deal with decentralised energy. In summary, the Mayor expects 25% of the heat and power used in London to be generated through the use of localised decentralised energy systems by 2025. Boroughs should develop policies on decentralised energy in their local plans. Development proposals should evaluate the feasibility of CHP and where it is appropriate also examine opportunities to extend the system beyond the site boundary.

The Lewisham Core Strategy policy 8 develops the London Plan policy and requires applicants for major new developments to connect to existing or approved decentralised energy network, safeguard potential networks and make provision for future connection to a network or contribute to its development, where possible in the regeneration and growth areas.

Process for considering and granting planning permission

For all major applications the Planning Service encourages pre-application discussions and the development of a Planning Performance Agreement (PPA), if a proposal has a good chance of receiving a positive recommendation within a time period agreed between the parties.

In developing Planning Performance Agreements, Planning Officers will wish to include discussions covering a wide range of subject matter that influences the development of schemes and which is required to make a planning submission a valid application. This will include proposals for energy and Planners involve the sustainability team in discussing the topic with applicant teams and would hope that a draft of the required document is shared at an early stage. The Sustainability Officer is a standard internal consultee on receipt of applications.

On major sites in particular, the energy strategy should not only comprise a consideration of a Combined Heat and Power system for the application site, but also

the possibility of a future connection to a district network, including any emanating from SELCHP. Officers would liaise with SELCHP if appropriate.

Should proposals for energy potentially have adverse impact on air quality, the Environmental Protection team is consulted. In the case of major schemes that require an Environmental Impact Assessment, specialist consultants are sometimes appointed.

Conditions would normally be placed on any permission requiring the delivery of CHP proposals and the potential connection into a wider future network.

How we evaluate energy assessments

Energy Assessments are assessed against policies in the London Plan and the Core strategy. If the application is referable to the GLA then they will be consulted, otherwise specialist advice is provided by the Lewisham Sustainability Officer. Through the PPA process, officers would seek to ensure that detailed discussions had taken place before the submission of an application, so that the submitted documents reflected what had already been accepted in principle.

How we monitor the implementation of the heating systems

Conditions placed on any planning permission would require a system to be fully delivered in line with submitted documentation, which would form part of an approval. Planning officers are spending more time in ensuring that approved developments are delivered to the standards set out in submitted documentation. This is a departure from more traditional ways of planning which tended to respond to complaints being made about schemes and it is resource intensive. It is desirable to sign PPAs covering the discharge of conditions and for officers to build up a good working relationships with applicant teams to allow inspections when necessary. It is fair to say that energy is a specialist area and its delivery is harder to observe than, for example, changes to the built form or public realm.

There could be opportunities for closer working with Building Control, especially when considering below ground works, such as the laying for pipework for future connections to decentralised networks, though this isn't possible where the Council's Building Control Service is not used by applicants which is common on major applications.

If energy remains a matter for planning assessment rather than being covered by other legislation or through the Building Regulations for example, it could be possible to require evidence through condition that systems are installed in line with approved details and that they are functioning fully, though such an approach would need additional and potentially specialist resource for verification. This would be at variance with LBL practice of imposing conditions that require schemes to be built out in line with approved details whenever appropriate, rather than needing later assessment. However, it should be possible to require that the applicant funds the independent verification of the system.