

25 June 2020

Submitted by the Knightsbridge Neighbourhood Forum (respondent ref. no. 51)

WESTMINSTER CITY PLAN EXAMINATION – MATTER STATEMENT 3

Matter 3 – Spatial Strategy

4) How are [the principles set out in Part A of Policy 1] consistent with national policy?

5) Do they cover all necessary issues?

Why Reg 19 City Plan (with minor mods) is not sound	What change to plan wording is required for soundness	Evidence
<p>As explained in the Forum’s statement in respect of Matter 1, the Plan fails to properly address the requirements of regional policy on what London needs to do in order to contribute to the achievement of the carbon reduction required by the Climate Change Act 2008 (as amended).</p> <p>Policy 1A makes no reference to these requirements, or to the Council’s subsequent declaration of a climate emergency and a commitment for the borough to be net zero carbon by 2040. Moreover, there is nothing in the supporting text about how this requirement flows through the overall spatial strategy; arguably the need to reduce greenhouse gas emissions is the only matter which every aspect of the spatial strategy can and must address.</p>	<p>Add a new clause 1A(11) to Policy 1 that reads: <u>“Ensuring that development contributes fully to the commitment to be a net zero carbon borough by 2040 without worsening indoor or ambient air quality.”</u></p>	<p>The Paris Agreement, ratified by the UK in 2016, enshrines a firm commitment to restricting the increase in the global average temperature to “well below 2°C above pre-industrial levels and [to pursue] efforts to limit the temperature increase to 1.5°C above pre-industrial levels” as well as an aspiration to achieve net zero greenhouse gas emissions during the second half of the 21st century. The Climate Change Act 2008 established a legally binding target to reduce the UK’s greenhouse gas emissions by at least 80% in 2050 from 1990 levels. To drive progress and set the UK on a pathway towards this target, the Act introduced a system of carbon budgets including a target that the annual equivalent of the carbon budget for the period including 2020 is at least 34% lower than 1990. In 2019, the 80% was amended in the legislation to 100%, in line with the Paris Agreement. The Committee on Climate Change May 2019 report (https://www.theccc.org.uk/wp-content/uploads/2019/05/Net-Zero-The-UKs-contribution-to-stopping-global-warming.pdf) highlights what the UK needs to do to achieve net zero carbon by 2050. See also the Climate Change Committee’s 2020 Progress Report to Parliament dated 25 June 2020 which provides practical examples of the policy changes needed https://www.theccc.org.uk/2020/06/25/covid-19-can-be-an-historic-turning-point-in-tackling-the-global-climate-crisis/.</p> <p>The Mayor’s London Environment Strategy 2018 (LES) sets out the challenge for London. Since 1990, carbon emissions have fallen by 25%. To achieve zero carbon by 2050, the rate of reduction must be increased threefold over progress to date since 1990. Much of the past reductions have been due to reduced gas consumption and decarbonisation of the national grid, but the LES forecasts that local actions within London will need to account for 25% of the 90% reduction required by 2050 against 1990 levels (Figure 34). Given that WCC</p>

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		<p>has committed to achieving this target by 2040, it must follow the LES but undertake all actions on a faster timetable.</p> <p>The impact of the COVID-19 crisis further highlights the extent of the changes needed. Research published on 19 May 2020 in the journal Nature Climate Change (Le Quéré, C., Jackson, R.B., Jones, M.W. et al. <i>Temporary reduction in daily global CO₂ emissions during the COVID-19 forced confinement</i>. Nature Climate Change 2020 - https://rdcu.be/b4lg7) found that the impact on 2020 annual carbon emissions of COVID-19 will depend on the duration of the confinement, with a low estimate of -4% (-2 to -7%) if pre-pandemic conditions return by mid-June (which can now reasonably be discounted as a credible scenario), and a high estimate of -7% (-3 to -13%) if some restrictions remain worldwide until the end of 2020. To place this in context, preventing a rise of much more than 1.5°C would require annual emissions to fall by about 50% (7.5% per annum) between now and 2030, and reach net zero by 2050 (source: IPCC Special Report on Global Warming of 1.5°C, October 2018). Under normal conditions, emissions have risen every year since 2016, with 2017-2019 seeing increases of 1.5%, 2.1% and 0.6% respectively.</p> <p>The Plan therefore needs to explicitly reflect the target in policy (net zero carbon) and needs to be much clearer about how it is going to achieve an even more ambitious timescale (2040 versus 2050). It must do so, as a minimum, by making clear reference to it in its main spatial strategy policy. This should explicitly show how its policies are informed by the draft London Plan which is directly addressing, through its own policies, the requirement to be net zero carbon by 2050 by requiring development to be at least Air Quality Neutral (Policy SI1) and all new major development to be net zero carbon (Policy SI2), reflecting the whole life cycle of construction and operation through its energy hierarchy. Please note also that Westminster has an emerging ‘Air Quality Action Plan 2019 – 2024’ that was considered positively by the Council’s Cabinet on 11 May 2020.</p> <p>The Council’s Environment Topic Paper (EV_ENV_001) states at paragraph 6.3 that, “...emerging data and analysis on energy use and carbon emissions trajectories being developed in response to Westminster’s Climate Emergency Declaration will help inform future City Plan reviews and add to the local evidence base for sustainable design policy.” The CCC May 2019 report highlights how challenging it will be to achieve net zero carbon</p>

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		<p>by 2050, so a 2040 date requires immediate action in this version of the Plan, not future reviews which may not come into effect until 2025 at the earliest.</p> <p>The Council’s Environment Topic Paper (EV_ENV_001) references two important documents – its draft Carbon Reduction Strategy (2020-2030) and its draft Carbon Offset Guidance – neither of which has been submitted to the Examination and appear to be unavailable generally on the internet. It is therefore not possible to understand how carbon reduction is to be achieved and how and when offsetting is appropriate as compared with direct on-site measures.</p> <p>Last but not least, it is necessary to consider ‘air’ holistically i.e. greenhouse gases, air quality, climate change and public health together, not as independent silos. The importance of striking this balance is reflected in our suggested amendments to Policy 1A.</p>

12) What was the intended purpose of including the Key Development Sites in Appendix 1 and referring to them in Policy 1? What is their status in terms of allocations and what evidence is there to support their inclusion for example in terms of flood risk and the effect on heritage assets?

13) What is the basis for the Council's proposed modifications in relation to these sites? What status would the sites have and how would they contribute to development needs?

16) What role will the Site Allocations DPD have in relation to these sites?

- 3.1. Ongoing correspondence between the inspectors and the City Council on the status of the 'Key Development Sites' set out in Appendix 1 of the Plan has still not clearly justified or clarified their status. The size and nature of these sites means that any future development of them will have significant effects on their immediate locality, and as such any proposals for these sites, and their initial allocation for development should be based on a thorough and robust appraisal as set out by the inspectors. This is of particular importance given that it is assumed the Council will be relying on these sites for significant housing delivery and for contributing significantly to other targets within Policy 1.
- 3.2. The only relevant associated site in Knightsbridge is the Hyde Park Barracks, which is subject to focused policies in the 'made' (i.e. adopted) Knightsbridge Neighbourhood Plan. The Knightsbridge Neighbourhood Forum's ('KNF's' or 'Forum's') understanding is that the site was allocated as part of the adopted City Plan (consolidated version November 2016), as one of the 'Proposals Sites' that were identified as being key for the delivery of the Plan's strategic objectives. In this, the Hyde Park Barracks is site number G3, allocated for residential as the preferred use. In the Draft City Plan the site was again listed originally as a 'key development site' in Appendix 1 of the Plan, again for residential use, with an indicative site capacity of 128 homes, albeit subject to primary legislation to release the site for development. In subsequent drafts of the Plan, the indicative capacity of the site was increased to 250 units (based on a change in site boundary) with additional notes added setting out key considerations for informing development proposals, including surrounding constraints, and the policies within the Knightsbridge Neighbourhood Plan.
- 3.3. However, there is ongoing concern that there is insufficient evidence to justify that the Key Development Sites are developable. The Forum's particular interest is in respect of the Hyde Park Barracks site as indicated above. This is a complex site with many constraints and issues which must be overcome in order to deliver (apparently) approximately 250 dwellings in a sustainable manner that respects its sensitive location, setting and key planning considerations, all of which is set out in detail in the Knightsbridge Neighbourhood Plan, in addition to the need to achieve biodiversity net gain without compromising the viability of development. No evidence has been submitted by the Defence Infrastructure Organisation or others to give assurance that there is a reasonable prospect of this being achieved.
- 3.4. If the inspectors are satisfied that the sites can remain part of the City Plan, this puts significant importance on the Site Allocations DPD in guiding the future development of these sites, based on a detailed understanding and assessment of these sites. As a minimum, the future Site Allocations DPD must specifically identify and provide the necessary context to ensure that the following matters (in addition to any other relevant planning issues) are addressed properly in relation to the Hyde Park Barracks site, with the 'made' Knightsbridge Neighbourhood Plan policy relating to the Barracks and MOL at the forefront:
- Heritage and Conservation
 - Townscape and views

- Landscape
- Amenity
- Biodiversity
- Metropolitan Open Land
- Land use
- Transport and highways impacts

3.5. The Plan must also, through its IIA, fully assess the sustainability impacts of each site in terms of CO₂ emissions, adaptability to extreme weather and efficient use of natural resources.