

25 June 2020

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

WESTMINSTER CITY PLAN EXAMINATION – MATTER STATEMENT 8

Matter 8 – Design and Heritage

Policy 39

- 1) *Taking each individually, are Policies 39-46 justified, effective, consistent with national policy and in general conformity with the London Plan?*
- 2) *Do Policies 39-46 effectively deal with the full range of issues?*
- 3) *Does Policy 39 have sufficient emphasis on water efficiency? Is it in general conformity with the London Plan in this regard? Have the viability implications been fully taken into account? Are the proposed modifications necessary for soundness?*

Why Reg 19 City Plan (with minor mods) is not sound	What change to plan wording is required for soundness	Evidence
<p>Policy 39D, as worded, is ineffective in providing clarity to developers as to the issues that they must address in order that development helps the UK to achieve its net zero carbon target of 2050 and Westminster borough to achieve the same target by 2040. In addition, it fails to acknowledge that a lot of development will be in the form of refurbishment of existing buildings and that the energy use of the UK’s existing building stock is one of the most significant contributors towards our current profile of emissions.</p>	<p>Amend clause 39D to read: <i>“Development will enable the extended lifetime of buildings and spaces and respond to the likely risks and consequences of <u>mitigate and adapt to</u> climate change by incorporating principles of sustainable design, including: ...”</i></p> <p><i>Amend clause 39D(3) to read:</i></p> <p><i>3. <u>optimising resource efficiency, including for refurbishments, by taking steps now to meet anticipated future energy and water needs and minimise urban heat island effects;</u></i></p>	<p>The revised wording proposed to Policy 39D follows the approach taken into Reading Local Plan Policy CC2 (Sustainable Design and Construction), adopted in 2019. This policy was assessed in the Sustainability Appraisal for its impacts regarding CO₂ emissions, adaptability to extreme weather and efficient use of natural resources. Negative impacts with regard to these objectives will be mitigated by other policies within the Plan.</p> <p>The Westminster Viability Report 2019 (EV_GEN_001) tested for the additional cost of developing to zero carbon standard and found that it has no material difference in terms of the number of sites that are rendered unviable by the higher cost. In fact, the report states that zero carbon adds 1.4% to costs of residential development (para. 3.13) and BREEAM ‘Excellent’ adds 2% (para. 3.14). Given that Policy 39 requires BREEAM ‘Excellent’ on non-residential developments therefore there is no reason why the policy should not require zero carbon for residential development <u>including refurbishments</u>.</p>

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	<p>Amend clause 39E to read:</p> <p><i>“Applicants will demonstrate how sustainable design principles and measures have been incorporated into designs, utilising environmental performance standards as follows:</i></p> <p><u><i>...3. The achievement of BREEAM or equivalent standards will be achieved alongside net zero carbon imperatives and without worsening indoor or ambient air quality.</i></u></p>	<p>It is more efficient to make long-term improvements to a building when it is built or refurbished than have to retrofit it at a later date e.g. change it from gas heating and water radiators to electric heating.</p>
<p>Policy 39 is not effective because it does not properly address the issue of water stress which has been identified in its evidence base as a major threat arising from climate change.</p>	<p>Amend clause 39D as above.</p>	<p>Westminster and the wider region is classified as an area of serious water stress by the Environment Agency. Thames Water’s Water Resource Management Plan 2019 (https://corporate.thameswater.co.uk/about-us/our-strategies-and-plans/water-resources#wrmp) identifies London as having a shortage of water supply compared with demand under its baseline scenario from now through the whole of the plan period (and beyond to 2099). The need to conserve water is paramount. It is therefore vital that high water efficiency standards are a policy requirement. At present, these should be the higher standards as required under Regulation 36(3) of the Building Regulations 2015.</p>

Policy 40

4) Is Policy 40 consistent with national policy and the statutory requirements associated with heritage assets? Is it clear? Are the proposed modifications necessary for soundness?

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<p>Policy 40 is not consistent with national policy because it does not appropriately</p>	<p>Add a new clause after 40R to read:</p>	<p>Paragraph 1.6 of the Council’s Viability Report (EV_GEN_001) notes that 76% of borough is covered by conservation areas and there are 11,000 listed buildings and</p>

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<p>balance to need for buildings to reduce their carbon emissions alongside the requirements of national policies for the historic environment.</p>	<p><u>RETROFITTING</u></p> <p><i>“Refurbishment of listed buildings and/or other buildings in Conservation Areas must mitigate and adapt to climate change.”</i></p>	<p>structures. They therefore are likely to form a major part of any refurbishment activity. The Committee on Climate Change’s May 2019 report entitled ‘Net Zero: The UK’s contribution to stopping global warming’ (https://www.theccc.org.uk/wp-content/uploads/2019/05/Net-Zero-The-UKs-contribution-to-stopping-global-warming.pdf), highlights what is needed to meet net zero carbon and this includes making all existing buildings more energy efficient (Box 6.1). Modern designs of double glazing – a common limitation of energy-efficient refurbishment of listed buildings and in conservation areas – can reflect heritage design so should be included as part of guidance to applicants in a supplementary planning document or equivalent. The Council’s Environment Topic Paper (EV_ENV_001) cites at paragraph 6.20 its ‘Retrofitting Historic Buildings for Sustainability’ document from 2013. Innovation in design has improved considerably in the seven years since it was published therefore it is out of date. For example, the statement in the document that double glazing in listed buildings will ‘generally not be considered acceptable’ (p.33) must be reviewed.</p>