

**Westminster City Plan 2019-2040 – Examination in Public
Response to Inspector’s Matters, Issues and Questions**

Matter 7 – Environment

(15) - Should Policy 37 set out carbon reduction carbon targets? Is the proposed payment in lieu for developments unable to meet carbon reduction requirements clearly articulated?

1. In September 2019, the City Council declared a “Climate Emergency.” In doing so, it pledged that the City Council’s activities would be carbon neutral by 2030, with the wider City following suit by 2040.¹
2. This is an ambitious target. WPA has endorsed this declaration and welcomed the priority being placed upon climate action. The role of the built environment industry will be crucial in contributing to achieving these targets, as it contributes about 40% of the UK’s total carbon emissions.
3. In this context, WPA considers that the City Plan should acknowledge this aspect of City Council policy and express it in planning terms, given the key role of the built environment in carbon emissions and the need to make sure that development proposals over the plan period contribute to this goal.
4. WPA understands that further guidance, both technical and in an SPD, is being prepared on carbon reduction, which it welcomes in principle. However, given the importance of this topic and climate emergency declaration, it suggests that additional detail should be included within the City Plan.
5. This should, in addition to specifically referencing the climate emergency and associated carbon reduction targets, also address the following matters in order to support delivery.
6. It should provide a **clear definition, or definitions, of zero carbon development** applicable to the range of building and development typologies within Westminster, taking into consideration emissions across the whole lifecycle of a building. WPA suggests that the UK Green Building Council definition is appropriate.²
7. WPA suggests that additional text is introduced to state that

¹ WCC, Westminster declares climate emergency, 2019: <https://www.westminster.gov.uk/westminster-declares-climate-emergency>

² UKGBC, Net Zero Carbon Buildings: a framework definition, 2019: <https://www.ukgbc.org/wp-content/uploads/2019/04/Net-Zero-Carbon-Buildings-A-framework-definition.pdf>

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“37.3A. By zero carbon development, the City Council means the definition proposed by the UK Green Building Council. This will mean that:

- i. The energy used by buildings in operation should be reduced and where possible, any demand met through renewable energy. Any remaining emissions from operational energy should be offset to achieve net zero carbon.**
 - ii. The ‘embodied’ emissions associated building materials and construction works should be measured, reduced and offset.”**
8. It should recognise that the extent to which a development proposal will lead **to reduced carbon emissions and/or zero carbon development will be a public benefit** that will be given significant weight when assessing proposals, especially when proposals involving an element of heritage harm requiring a balancing exercise of that harm against the public benefits arising.
9. WPA considers that, to achieve the objectives of both the City Plan and wider public policy, greater weight is given to development proposals that lead to reduced carbon emissions across the whole lifecycle of the building, when dealing with heritage considerations. This should also extend to material choice, where a wider palette of materials that are similar, but not identical, to traditional materials should be acceptable where there are clear energy efficiency or carbon benefits (either embodied, or operational) in doing so. Relying upon traditional materials in all cases will not maximise carbon reductions.
10. WPA suggests an additional paragraph within Policy 37:

“37AB. Where a proposed development will reduce on site energy demand and carbon emissions, this will be considered as a public benefit to which substantial weight will be given.

The use of materials and construction techniques that reduce whole lifecycle carbon emissions (including embodied and operational) will be encouraged, including within conservation areas and listed buildings where visually similar to traditional materials being replaced.”
11. Policy should provide some guidance on the use of the carbon offset fund, including the use of contributions received by the fund to reduce emissions from across the City’s building stock and to support investment and innovation. The fund should be widely accessible, to support innovation.

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12. This could include the retrofitting of the City Council’s buildings, as well as community-led green infrastructure projects and projects by SME developers and homeowners that would not otherwise have the resources to invest in green infrastructure.

13. This could be addressed by amendments to Paragraph 37.5:

“Carbon offset funding will then be allocated to projects that will reduce carbon emissions elsewhere in Westminster, including by the City Council as well as community-led green infrastructure projects and projects by smaller developers and homeowners. The carbon savings that arise from the fund will be reported and monitored.”

14. The City Plan should provide a clear framework to determine what level of assessment and analysis will be required for different scales of development. It should take into account the carbon emitted across the whole lifecycle of the building – which will include any future refurbishment, maintenance and demolition. The extent of assessment required should be proportionate to the scale and complexity of the proposed development, including the level of physical intervention to the building, including both its fabric and plant systems. In some cases, where planning permission is sought for a change of use with no, or minimal, physical works, an energy assessment may not be proportionate.

(16) – Should the requirement for major development to install energy monitoring equipment and undertake energy monitoring be specified in Policy 37?

15. WPA recognises and supports the need for improved monitoring and public reporting of the actual energy performance of buildings. It would be keen to discuss with the City Council how this could best be implemented, but considers that this could be best addressed within supplemental guidance.