

Draft Greening SPD Consultation

Responses Received and Council Response

March 2021

The tables below set out the responses received on the Draft Greening SPD Consultation which was undertaken for six-weeks between 12 January to 23 February 2021. The last column titled “Council’s Response” also sets out areas where the text will be changed in the final Greening SPD. The changed/intended to change text is shown in **blue and emboldened** text.

Section 1: Introduction

Q1: Do you think these are the correct objectives, or is there anything else which the SPD should consider?

Respondent Name	Comments	Council’s Response
Jane Whewell	Thank you for the opportunity to comment on the draft Greening SPD. This is clearly a significant piece of work and it has been encouraging to read. We have a number of comments which we hope will still deliver the objectives of the proposal while preventing its misuse in a manner that would harm the Borough and residential amenity.	Support noted.
Michal Levin	Good objectives Suggest that trees should be planted wherever possible along bus routes	Support noted. We agree that trees make an important contribution to greening the borough. As noted in section 11 of the SPD, the Council has committed to planting additional trees where possible and the Borough is already home to over 8,000 street trees. This aim is supported by Policy CR6 of the current Local Plan, which states the

Respondent Name	Comments	Council's Response
		<p>Council will require the protection of existing trees and provision of new trees.</p> <p>Unfortunately, not all bus routes are able to accommodate trees planted along them due to constraints such as utility cable wires, but the Council is along looking for opportunities to plant additional trees.</p> <p>In addition, the Council's Arboriculture Department has committed to updating the Council's Tree Strategy and Trees and Development SPD.</p> <p>Several of the references to British Standards and Council Documents in the Trees and Development SPD are out of date and this will be rectified.</p> <p>Similarly, the Tree Strategy needs an update. It is anticipated that both revised documents will be ready for adoption in 2022.</p>
Ladbroke Association (Sophia Lambert)	<p>Yes.</p> <p>As the Ladbroke area consists chiefly of small or medium residential properties, most of our comments relate to those parts of the document that apply to them.</p>	Noted.
London Wildlife Trust (Mathew Frith)	<p>We support all of them in principle. For the last point, on the basis that even if developments deliver biodiversity net gain, this needs to be ecologically</p>	Support noted.

Respondent Name	Comments	Council's Response
	viable, ideally contributing towards a functioning 'nature recovery network', e.g: "Ensuring that developments contribute to urban greening and provide ecologically viable net gains for biodiversity."	
Roger Hudson	<p>The Council may feel itself, in its words, to be on a 'mission', but it is a misguided one, pointed in the wrong direction right from the start. It, together with the British and other governments, has accepted what is taken for the consensus view among scientists, on the speed of global warming and the consequent need for drastic action immediately. There is in reality far from a scientific consensus, with many experts having the gravest doubts about the modelling and temperature data that have been used to arrive at these claims. There is global warming, but it is not proceeding at a rate to justify the breakneck and panicked response that we are seeing. What's more, the current warmer cycle began some time before the Industrial Revolution kicked in, so claims of 'man-made' area out of order. There is hard evidence that storms and droughts are no worse than in the past. And there is also evidence that the C02 emissions, far from being an unmitigated evil, have in fact increased crop yields and have had a remarkable greening effect in many areas. There have been no 'extinctions' down to C02 - if you are looking for culprits, it is invasive alien species.</p> <p>The rush to be carbon neutral is leading to damaging distortions and the backing of wrong horses. Only 6% of world energy comes from renewables including</p>	<p>Comments noted.</p> <p>Kensington and Chelsea Council is required to develop planning policy which conforms with policy adopted at the Regional level by the Mayor of London in the London Plan, and national policy.</p> <p>Climate change and the need to mitigate its impacts have been identified by the UK Government as a key issue that the planning system can contribute to addressing in a significant way.</p> <p>The Greening SPD, conforms with the higher tiers of planning policy present in England which is a legal requirement.</p>

Respondent Name	Comments	Council's Response
	<p>nuclear. They cannot be the answer. Wind should stop being subsidised, and the claims of wind firms about profit and lower prices be looked at very sceptically. Instead the money should go into small reactor nuclear fission, and nuclear fusion, and possibly hydrogen. The electric car's effectiveness depends on what makes the electricity, and it takes a lot more emissions to make the cars themselves, because of their batteries, than a petrol one. Before you advocate more and more car charge points, you must concentrate your minds on generation rather than consumption. You want a mass switch from gas boilers for home heating to air source heat pumps (ground source can't be practical in the RBKC). They have not proved nearly as effective as was promised; they need electricity; they make a noise, and they take up outside space that is not there in the case of terraced houses. They would be a classic case of the hasty adoption of the wrong solution, then to be repented at leisure, and at great expense.</p> <p>In the rush to chase carbon neutrality, it is easily forgotten that China's use of fossil fuels won't peak until 2030 and will go on at that level or near it for some time - quite apart from what other developing nations will consume. It may seem ridiculous to talk in these more terms in relation to a borough council, but unless underlying assumptions are re-examined first, the whole exercise is a waste of time, or perhaps that should be energy.</p>	

Respondent Name	Comments	Council's Response
Michael Stock (Michael Stock)	Yes, Congratulations!	Support noted.
Ewen Angus Cameron	<p>Please excuse me if I don't read the entire consultation in detail but I would like to cite one example of the impact of planning policy.</p> <p>I live in a 4 storey house, 2 of these at street level or above plus a mansard extension on top. This provides me with a flat roof on which I wished to fit a solar panel. For optimum performance the panel needs to be angled south which would raise one side about 18 inches above the roof. Planning regulations prevented me from doing so because my house is in a conservation area.</p> <p>The roof is about 35 ft above street level and the solar panel would be visible only to low flying aircraft. Planning policy needs to presume an inherent advantage in such structures in the 21st century. I have no doubt that at some point double glazing would have been considered beyond the pail. Time to move on.</p> <p>Other comments:</p> <ul style="list-style-type: none"> • 200 years ago a pavement in the High Street would have been considered unnecessary. 200 years later the rest of Europe has recognised that bikes should be prioritised over cars as the norm. Your recent actions demonstrate a 19th century mindset. 	<p>Comments noted.</p> <p>This Council supports the use of solar panels where appropriate and has provided advice for householders and applicants on the use of solar panels in sections 7 and 9 of the SPD. However, as explained in section 9, in the case of listed buildings or properties located within conservation areas. These must be dealt with on a case by case basis to determine how the installation of solar panels may impact the special heritage interests of the property itself or the character of wider conservation area.</p> <p>The Council is also supportive of facilitating electric vehicle charging infrastructure and promoting sustainable and active transport methods over the private car. This is outlined in section 10 of the SPD as well as the current Local Plan (Policy CT1 for example). However, we are also aware that many residents rely on the use of a private car, particularly for work, and electric vehicles continue to be financially inaccessible to many. The Council does not wish to penalise residents for using a private car but rather encourage greater usage of sustainable modes of transportation as much as possible.</p>

Respondent Name	Comments	Council's Response
	<ul style="list-style-type: none"> • Electric vehicle charging spaces should not be permitted parking spaces for petrol vehicles, vide the space in Abingdon road on the corner of Pater Street. 	
Milner Street Area Residents' Association (Richard Grantley)	<ol style="list-style-type: none"> 1. We welcome the draft Greening SPD as benefitting the environment, both in terms of air pollution and, we hope, in terms of conservation. 2. The SPD should ensure that any additional “green” infrastructure is not at the expense of other types of pollution, e.g. visual pollution or noise pollution, and that existing planning standards are maintained. 3. The Local Plan will need to be reinforced to reflect the provisions of the SPD, and at the same time ensure that existing planning standards are maintained. We fear that if this does not happen, the provisions of the SPD – which ranks as subservient to the Local Plan - will be ineffective. 	<ol style="list-style-type: none"> 1. Support noted. 2. Once adopted, the SPD will be a material consideration in determining planning applications, but the guidance in the SPD will be followed alongside other policy requirements such as on mitigating noise impacts. 3. The Council is also currently in the process of a New Local Plan Review with the aim to adopt a New Local Plan in 2023. A key element of the work on the new plan will be to transfer the guidance outlined in this SPD into policy. This will be an opportunity to review the impact of the SPD and improve upon it where needed.
Gaunt	The objectives are fine	Support noted.
Luisa Cicognani	<p>The wording is not very clear. the key objectives are net zero by 2040 to be achieved by</p> <ol style="list-style-type: none"> a) all business and residents of K&C to reduce carbon footprint to 0 b) increasing the use of renewable energy (ANY including using hydrogen in gas pipes and fitting boiler that can use hydrogen) c) avoiding the loss of green space (like building up in 	<p>Noted.</p> <p>The SPD objectives are intended to be broad and cross cutting rather than defining more specific detailed objectives, which are set out in each section of the SPD. The SPD is also a planning document and therefore can only set objectives that can be met through the powers of the planning system.</p>

Respondent Name	Comments	Council's Response
	gardens) d) increasing bio diversity by increasing green space e) reducing emissions by facilitating electric and hydrogen vehicle use f) avoid glass and modern building which disperse energy and have high energy consumptions	
Sabine Laurent Varoutsi	None	Noted.
G Thomson	On behalf of Earls Court Development Company The objectives of the Greening Supplementary Planning Document (the 'SPD') are strongly supported by ECDC. They will form an integral part of the design development for the Earls Court site, ensuring that climate change and the health of the borough are considered throughout the design process. As set out in more detail below (question 3), the objective to prioritise the retention and reuse of buildings is admirable, but it is important that the SPD recognises that there may be circumstances where redevelopment would achieve better outcomes overall for the borough. Accordingly ".....this is about prioritising the consideration of retention and refurbishment prior to demolition and redevelopment."	Support noted. We have provided a response to the comment on question 3 in the relevant section below.
Historic England (Katie Parsons)	Generally, we support the approach set out in the guidance that focuses on understanding sustainability over the long term . Historic England advocates the reuse, repair, upgrade, and retrofit of existing buildings	Historic England's support is noted and welcomed. Section 9 of the SPD explicitly recognises the positive role that historic buildings play in addressing carbon

Respondent Name	Comments	Council's Response
	<p>rather than demolishing and rebuilding, and we are pleased to that this is reflected in the guidance. In addition to this we have the following comments to make:</p> <ul style="list-style-type: none"> • By caring for and reusing historic buildings and heritage assets we can save energy and carbon dioxide through better maintenance, management and energy efficiency measures; and avoid the carbon dioxide of constructing new buildings and places. It would be helpful if the guidance more explicitly recognised the positive role that historic buildings play in addressing carbon costs. • We welcome the emphasis that the SPD places on treating historic fabric differently to modern fabric. • The SPD could mention the risks posed by maladaptation, which can result in historic buildings becoming less thermally efficient if inappropriate retrofit measures are installed. <p>We have published the following technical guidance and information which may be of use. We are pleased to see that several of these are already included in the SPD.</p>	<p>costs. This is also recognised in section 3 of the SPD which seeks the reuse of existing buildings over demolition in line with circular economy principles.</p> <p>Section 9 of the SPD also goes into significant detail about the risks of maladaptation and the need to keep historic buildings in a good state of repair.</p>
KRACR (Chris Lenon)	<p>The Chelsea Society</p> <p>The Chelsea Society provides the following comments</p>	Noted.

Respondent Name	Comments	Council's Response
	<p>on the Draft Greening SPD, which RBKC is consulting on. These comments do not imply that the Chelsea Society has a position on climate change. There is a divergence of views in the Society on the subject of climate change and the measures and targets which the UK government has legislated. However, we can comment on the Draft Greening SPD as follows. Given the aims of the document, the objectives are correct. It would be helpful if officers would adopt a proactive approach to applicants to achieve the objectives, ie a response of while you cannot do what you propose, if you modify it in this way, it will be acceptable.</p>	<p>The Council aims to be as pro-active as possible with applicants to ensure good growth throughout the Borough and that the best development proposals can come forward.</p> <p>We offer a pre-application advice service, which is available to all applicants. As part of the pre-application advice, officers will suggest how a proposal can be modified to ensure it conforms with relevant Development Plan policy.</p>
<p>TfL Planning, Transport for London (Richard Carr)</p>	<p>General points</p> <ul style="list-style-type: none"> • The aims and goals of zero-carbon, active travel and healthy transport are welcomed by TfL. The Mayor of London's targets for a shift away from car travel towards walking, cycling and public transport by 2041 as well as the Healthy Streets Approach and Vision Zero should provide a strong basis and justification for measures in the SPD • It would be helpful if an evidence base could be referenced providing background information such as a map showing the distribution of areas of poor air quality and an indication of the contribution of different sectors to carbon emissions and other pollutants 	<p>TfL's support is welcomed.</p> <p>References to relevant evidence, additional guidance and background information are provided in the Appendix and throughout in the SPD in footnotes.</p>

Respondent Name	Comments	Council's Response
<p>Lots Village Chelsea Association of Residents and Businesses (Martyn Baker)</p>	<p>The whole of the borough is an air quality management area but there is no indication in the draft SPD that specific plans have now been drawn up by the Council, in consultation as necessary with TfL, to bear down on traffic produced pollution beyond installing more charging points in the hope that over the next few years more drivers will turn to electric cars, despite their expense, even though the recently announced increase in resident parking charges are not in themselves a big inducement. Otherwise it seems by default the Council is just pinning its hopes on the ULEZ scheme.</p> <p>Instead we believe the following measurable steps are urgently needed: --</p> <ol style="list-style-type: none"> 1. The provision (using the Parking Surplus) of sufficient monitoring stations to track actual pollution levels on congested routes. 2. The regular publication of these levels to sensitise road users including pedestrians. 3. The provision of robust No Idling Signs on a much more consistent basis across the borough with a target of such signs every 100 yards where there is provision for parking and so idling. Furthermore being at present made of polystyrene these signs are far too easily vandalised and torn down. Only durable metal signs can signify that the matter is being taken seriously. 4. The provision of dedicated anti-pollution wardens to clamp down on anti-social parking/ idling often blocking 	<p>Comments noted.</p> <p>The Council is aware that the Borough's air quality is of major concern. Section 10 of the Greening SPD sets out our guidance for how all development proposals can ensure they give due regard to air quality considerations and the requirement that new development must be air quality neutral, requiring no negative impact on air quality. These requirements conform fully with those set out in the New London Plan, Policy SI 1 in particular. Please note that the Air quality neutral objective is soon to be superseded by an air quality positive objective, which the GLA is due to provide guidance on in due course.</p> <p>In addition to the air quality section, almost all sections of the SPD, from the whole life cycle carbon approach, energy policies and retrofitting existing buildings, to urban greening and biodiversity aim to reduce carbon emissions across the Borough, and by doing so, also contribute to improving our air quality.</p> <p>The Greening SPD is intended to supplement the current Local Plan rather than taking its place or repeating policy. Key themes and objectives of the Local Plan such as Chapter 24 – Respecting Environmental Limits and the promotion of sustainable and active modes of transportation such as cycling and walking over the private car (Policy CT1 for example) remain valid. These are also all policy areas that aim to</p>

Respondent Name	Comments	Council's Response
	<p>the flow of traffic on the Kings Road.</p> <p>5. More yellow boxes equipped with enforcement cameras to help unblock congested junctions onto the Kings Road, to raise revenue and deter amber gambling.</p> <p>6. Rerouting of National Coaches away from their lengthy detour between Victoria Coach Station and Cromwell Road via Royal Hospital Rd, the Embankment and ECOWS which adds much pollution, as does the One Way System itself particularly at weekends with long tail backs eastwards onto the Embankment; the 2010 Local Plan looked forward to it returning to two way working as we still do.</p>	<p>produce positive outcomes for air quality across the Borough.</p> <p>The Council is currently in the process of a New Local Plan Review with the aim to adopt a New Local Plan in 2023. A key element of the work on the new plan will be to transfer the guidance outlined in this SPD, such as the guidance on air quality, into Local Plan policy. This will be an opportunity to review the impact of the SPD and improve upon it where needed, in line with the New London Plan and NPPF.</p> <p>Finally, it is important to note that the issue of air quality is a larger problem that planning alone cannot solve. The Council's Pollution Regulatory Team are working on developing a new Air Quality Action Plan, which will outline how the Council plans to address the Borough's air quality and will include a range of strategies and interventions that are outside of the remit of the planning system. This is discussed in section 10 of the SPD. The Council also has an Air Quality SPG, which will be updated later this year.</p> <p>At present the polyboard signs are the only ones permitted for use by the Department for Transport (DfT). London Councils have lobbied the DfT for new permeant signage, however due to the pressures of Brexit, the DfT has been unable to provide approval. The polyboard signs will be replaced once the DfT has granted approval.</p>

Respondent Name	Comments	Council's Response
		<p>The Council's Waste Enforcement Officers already target problem areas in the borough and are authorised to ask idling drivers to switch off their engines. The officer will explain to the driver why they are asking them to do so and can provide a pamphlet with further information. If a driver refuses, our officers can issue a £20 fixed penalty notice which can increase to £40 if unpaid. Residents are able to report idling vehicles through the Council website where an Enforcement Officer will be able to investigate.</p>
Environment Agency (Lisa Mills)	No comments	Noted.
The Knightsbridge Association (Carol Seymour-Newton)	<p>The Knightsbridge Association (KA) is pleased to respond to your consultation on the Draft Greening SPD. We support your direction of travel but consider that you need to be clearer about the scale and urgency of what must be achieved by all forms of development and refurbishment requiring planning permission, not relying so on major development, by 2040 at the latest. This clarity needs to be backed then by robust wording and requirements in your Greening SPD to deliver those outcomes in that timescale. Please also conform the Greening SPD fully with the New London Plan's requirements for Air Quality Focus Areas, air quality generally and the minimising and eliminating of greenhouse gas emissions.</p>	<p>The Knightsbridge Association's general support is noted.</p> <p>Though we have the target to be a carbon neutral borough by 2040, we are aiming for all Council operations to become carbon neutral by 2030. The Council's Climate Change Team are working on producing a new Climate Emergency Action Plan to outline how we plan to achieve this target.</p> <p>The 2040 target for the whole borough is particularly ambitious in Kensington and Chelsea due to the historic nature of most of the residential building stock. The requirements set throughout the SPD, which are predominantly focused on major development, conform with the requirements set out in the New London Plan</p>

Respondent Name	Comments	Council's Response
		<p>and we cannot set policies that require standard too far beyond these in an SPD such as this.</p> <p>Regarding air quality, the Council is aware that the Borough's air quality is of major concern. Section 10 of the Greening SPD sets out our guidance for how all development proposals can ensure they give due regard to air quality considerations and the requirement that new development must be air quality neutral, requiring no negative impact on air quality. These requirements conform fully with those set out in the New London Plan, Policy SI 1 in particular. The Air quality neutral objective is soon to be superseded by an air quality positive objective, which the GLA is due to provide guidance on in due course.</p> <p>We agree that reference to Air Quality Focus Areas as outline in Policy SI 1 of the New London Plan has been omitted and we will add this to para. 10.1 of section 10 of the SPD (pg. 64).</p> <p>Finally, almost all sections of the SPD, from the whole life cycle carbon approach, energy policies and retrofitting existing buildings, to urban greening and biodiversity aim to reduce carbon emissions across the Borough and are in full conformance with relevant policies in the New London Plan.</p>
Richard Crane	The planning objectives outlined are more or less correct, what's missing is any notion of accountability.	Comments noted.

Respondent Name	Comments	Council's Response
	<p>While its essential to have clear objectives these mean nothing if they are not put into practice. 'Greenwashing' is the bane of many an environmental initiative and the movement as a whole.</p> <p>My reason for responding to this consultation is because I believe RBKC is guilty of 'greenwashing' its proposed development for a mixed use residential building on Acklam Road. Reading this SPD and knowing what I do about the Acklam Road development leads me to thinking that without any measures for accountability this SPD is little more than a gimmick.</p> <p>My comments are mainly focused on Sections 10 & 13 and 20.</p>	<p>It is the planning application process, where applicants and development must demonstrate they have met all relevant requirements set out in Development Plan policy that primarily ensures accountability in the current UK/English planning system.</p> <p>Once adopted the Greening SPD will be a material consideration in determining planning applications. Therefore, its requirements will apply to all new development in the Borough. It cannot set requirements retroactively, however. The Acklam Road development (plots 5 and 6) was granted permission last year prior to the production of this SPD.</p> <p>In terms of drainage the proposal included considerable reduction of surface water run-off (96 to 98%). The proposed SuDS were an attenuation tank and green roofs at ground level (refer to chapter 12 of the SPD). The site's constraints (lack of space due to the footprint of the building, root protection zones, and impact on construction costs) meant that further SuDS were not able to be implemented.</p> <p>Section 11 of the SPD sets out the urban green factor methodology for assessing the amount and quality of green infrastructure provision in a development. We set the requirement for all residential developments to meet a UGF of 0.4 and 0.3 for non-residential development, in accordance with the New London Plan. The UGF was not applied to this development as</p>

Respondent Name	Comments	Council's Response
		<p>the New London Plan had not been adopted at the time of approval.</p> <p>The GLA are also in the process of producing various guidance documents for energy assessments, whole lifecycle carbon assessments, circular economy statements etc. These will set benchmarks, standards and monitoring processes, which the Council will use to robustly assess planning applications and ensure development meets the requirements set out in the SPD.</p> <p>Comments on sections, 10, 13 and 20 are addressed in the relevant sections below.</p>
Fernando Lobo	<p>SPD could prioritise recycling and waste management.</p> <p>How is it possible that I have to throw out my rubbish on the sidewalk? There need to be clearly labelled communal dumpsters which promote waste segregation, recycling and keeping the streets clean. This saves money, promotes a healthier and cleaner environment and tackles the large consumption of single-use plastic.</p>	<p>Comments noted.</p> <p>Residents can recycle in one of two ways, depending on what type of property they live in.</p> <p>Large shared housing, e.g. flats, estates and some large mansion blocks, are provided with large communal recycling and waste bins. We provide residents with reusable bags to take their recycling to their shared bin.</p> <p>For individual households and smaller mansion blocks, we provide a kerbside collection, where we collect waste and recycling from bags, either from a bin store, or from the pavement, as near to the kerb as possible and without causing obstruction. This is because most</p>

Respondent Name	Comments	Council's Response
		<p>of these properties do not have space for bins. Residents who live in these properties are delivered clear recycling bags every quarter, to put their recycling in.</p> <p>To order a reusable bag or pack of clear recycling bags, visit: https://www.rbkc.gov.uk/bins-and-recycling/rubbish-and-recycling/recycling/order-clear-or-reusable-recycling-bags-residents</p> <p>We will add an additional section explaining the requirements for municipal waste and recycling that development should meet at the end of section 3 of the SPD, after figure 3.2.</p>
DP9 (Dan Fyall)	<p>St William is client-</p> <p>We agree with the stated objectives of the SPD.</p>	Support noted.
Cornwall Mews South (West Side) RA	Yes but do consider the needs and views of existing residents.	Support noted.
V Rowlands	Yes. But they should include specific references to reducing pollution through making it easier and safer to walk and cycle, not just the reference to electric vehicles.	<p>Comments noted.</p> <p>We will add specific reference to promoting active modes of transport such as walking and cycling in the air quality objective on pg. 5.</p>
South Kensington	I think these are the correct objectives	Support noted.

Respondent Name	Comments	Council's Response
Estates (Tim Butler)		
Ms Sarkis	<p>More specific guidance and more specific mandatory requirements for "green corridors" in any development: this is a relatively cheap but important way of helping wildlife and the environment.</p> <p>The water/sewage infrastructure is barely mentioned in terms of huge demands put upon it by far greater use today than say twenty years ago of power showers, washing machines, dishwashers and domestic pumps to increase water pressure for showers. The numbers of these have increased enormously just in the vicinity of Warwick Road. the smell in hot days of summer emanating from manhole gutters in the road is awful.</p> <p>Mains pressure is anecdotally less than previously. Developments should not increase the number of homes in the borough perhaps except on a small scale, such as existing houses are subdivided, the latter which I would support. Large developments have reached full capacity for the environment.</p>	<p>Comments noted.</p> <p>This Council supports green corridors, and these are encouraged under Policy CE4 of the current Local Plan. The Greening SPD is intended to supplement the current Local Plan, rather than tacking its place or repeating policy.</p> <p>The Council is currently in the process of a New Local Plan Review with the aim to adopt a New Local Plan in 2023. A key element of the work on the new plan will be to transfer the guidance outlined in this SPD into policy. This will be an opportunity to review the impact of the SPD and improve upon it where needed.</p> <p>The existing Local Plan refers to the provision of water and sewerage infrastructure (Policy CE2 k and l). Thames Water is consulted when large development is proposed and they provide comments for both, water supply (mains pressure) and wastewater (sewer capacity). Chapter 12 of the SPD refers to how development will have to provide a substantial reduction of surface water run-off rates (50% in small developments and well over 90%-greenfield run-off for major development). Reducing surface water run-off which enters the combined system will have a benefit in the capacity of the local sewers. However, it is important to point out that the sewer system which</p>

Respondent Name	Comments	Council's Response
		serves the borough also serves other areas higher in the catchment (such as Camden and Brent) so there is a limit to what the Council can control. It is important that other boroughs also follow the London Plan and local policies to address the historic lack of capacity in the sewers.
	The objective are good but should also consider preserving the current green areas instead of allowing them to become polluted.	Support and comments noted. The Council protects existing green and open spaces in the Borough through Policy CR5 of the current Local Plan. The Greening SPD is intended to supplement the Local Plan, rather than tacking its place or repeating policy.
St Helen's Residents Group (Jenny Harborne)	I think it's ok to have zero carbon targets but I think other legislation like Building Control is there to assess how this is done and to monitor it. This is complex building physics and should not become part of local planning assessments.	Comments noted. The SPD can set standards locally which are assessed against minimum building regulation requirements.
Cadogan Estates Limited (Jane Henshaw)	We agree with the overall objectives, however we would wish to see: 1. Increased flexibility to allow for a variety of approaches to address the issue; 2. Encouragement for developers to adopt a wide range of technologies and standards to meet the standards; 3. Increased understanding of the impact that meeting the objectives will have on the viability of the	General support for the objectives of the SPD noted. Concern with regards to cost and viability of the requirements outlined in the SPD noted. However, the Greening SPD has been drafted in conformance with the policy requirements set by the New London Plan and objectives such as the application of circular economy principles, the whole life cycle carbon approach, urban greening etc. will therefore be

Respondent Name	Comments	Council's Response
	<p>developments.</p> <p>The approach that emerges from the consultation process needs to be carefully considered so as to balance promoting development such that sustainable objectives can be achieved, whilst not being prohibitively costly, and therefore stifling and preventing the renewal and replacement of the built environment.</p> <p>Taking each objective in turn:</p> <ul style="list-style-type: none"> • Carbon neutral borough by 2040: we celebrate and support this ambition. Cadogan also has a net zero carbon target by 2030. • Circular economy: we agree with the principle of prioritising retention, but when considering modern ways of living, the structure and fabric of a property often need to be entirely updated to meet current and anticipated needs. In some instances, it is more cost and carbon efficient over the lifetime of a property to demolish and rebuild, reusing materials where possible and using modern sustainable methods of construction. • Whole life-cycle cost: we support this objective, although have concern about the additional professional fees that this will incur and also the lifecycle duration. We consider 30-40 years reasonable 	<p>material considerations when determining planning applications going forward in any case.</p> <p>That said, the Council does not wish to hinder good growth, and applications will continue be assessed on its individual merits and on planning balance against all relevant Development Plan policy.</p> <p>We also note that greening objectives and technologies are still emerging and are not yet fully understood. The Council will be monitoring how they work and their impact on development, with the aim to ensure we adapt policy where needed and support the best technologies and development going forward.</p> <p>To that end, the Council is currently in the process of a New Local Plan Review with the aim to adopt a New Local Plan in 2023. A key element of the work on the new plan will be to transfer the guidance outlined in this SPD into policy. This will be an opportunity to review the impact of the SPD and improve upon it where needed.</p>

Respondent Name	Comments	Council's Response
	<p>for internal fabric and services, and at least 80-100 years for building structure (foundations, external walls, roofs).</p> <ul style="list-style-type: none"> • Energy hierarchy & monitoring: we agree with the order of the prioritisation shown in figure 1. • Guidance to householders & retrofitters: clear guidance to householders and contractors who specialise in retrofitting properties will be of benefit. However we are concerned that the examples given in 5.19 and 7.9 are of properties less typically found in RBKC, and so may be mis-leading. • Air quality: we are in agreement, provided that EV and supporting electrical infrastructure is provided and supported. We are concerned about the electrical infrastructure particularly and the need for additional electrical sub-stations. The requirements of the energy providers can be restrictive in terms of housing such sub-stations as ground level space is usually preferred, rather than below ground / basement areas. The cost of electrical sub-stations is costly and is often paid for by a single developer, but once built, any spare capacity that is available, can benefit the wider neighbourhood, without needing to contribute to the spare capacity. • Flood risk: we support this objective and the need for 	

Respondent Name	Comments	Council's Response
	<p>SuDS is understood but is challenging in an urban environment with extremely limited space. For example, below ground attenuation tanks are challenging to construct; above ground planting schemes incorporating SuDS are challenging to make attractive, as it is challenging to contain and maintain soft landscaping, where surface water can contain salts and oils from highways.</p> <ul style="list-style-type: none"> • Urban greening & biodiversity: we agree with this objective, although are concerned that in considering an individual property, rather than its context may lead to too much emphasis being placed on incorporating greening within a scheme. For example, many of our developments are located close to our garden squares, which could be used to offset our requirement for urban greening. The policy could be shaped to reflect the urban nature of RBKC. 	
Earl's Court Area Action Group (Bella Hardwick)	<p>"The Council's ambitions to meet its target to be a carbon neutral Borough is by 2040". Other Councils have targets of 2030 and 2035. We propose that the Council should consider these plans to see if they could learn from them and bring the RBKC date forward.</p> <p>"Applicants demonstrating how they will improve air quality by incorporating various measures including support for electric vehicle charging infrastructure." We think it should be compulsory that applicants</p>	<p>Comments noted.</p> <p>Though we have the target to be a carbon neutral borough by 2040, we are aiming for all Council operations to become carbon neutral by 2030. The Council's Climate Change Team are working on producing a Climate Emergency Action Plan to outline how we plan to achieve this target.</p> <p>The 2040 target for the whole borough is particularly ambitious in Kensington and Chelsea due to the historic nature of most of the residential building stock.</p>

Respondent Name	Comments	Council's Response
	<p>demonstrate how they would provide air quality monitoring equipment and pay for independent testing procedures before, during and after construction. This should also apply before demolition. In both cases, the Council must ensure that any environmental health complaints are to be made to the Council and not the developer and that the complaints procedure is properly managed with adequate personnel resources.</p>	<p>However, policy should be adapted as knowledge and the issues they target evolve. The Council monitors the impact of policy and will update targets if possible.</p> <p>The planning process requires 'Major Developments' to submit a Dust Risk Assessment (DRA) as part of their supporting evidence. Under the GLA Supplementary Planning Guidance 'The Control of Dust and Emissions from Construction & Demolition Sites' and the IAQM 'Guidance on Land-Use Planning and Development Control: Planning for Air Quality' sites deemed Medium Risk and above are required to have air quality monitoring, which is secured by the Council through S106 agreements or planning conditions. Under these guidance documents monitoring of the development is not required in the operational phase, only until the construction phase is completed. A baseline assessment of air quality conditions surrounding the development to include pre-construction / demolition monitoring is required. Developments that fall below the 'Major Development' threshold are automatically assigned Low Risk status; however, these are reviewed on an individual basis by the Pollution Regulatory Team to assess if monitoring or further action is required. However, we cannot set requirements that fall outside of the planning system, local policies and Best Practice Guidance. Only when a site is deemed to have a significant negative effect on the local air quality, that cannot be mitigated against would monitoring be required post construction. If any</p>

Respondent Name	Comments	Council's Response
		<p>building requires ventilation the developer has to demonstrate (through monitoring and modelling) that air intakes are located in locations of good air quality.</p> <p>Through the Dust Risk Assessment process mitigation measures are assigned to the site. This will include the requirement for developers / onsite contractors to notify the Council of any complaints regarding dust and the actions taken to rectify the situation.</p> <p>The Council has an extensive automatic and passive monitoring network that records NO2, PM10 and PM2.5 concentrations. On an annual basis we review this network as part of our statutory Annual Status Report to identify any gaps or new locations that should be considered.</p>
<p>CAMELLIA Research Project Imperial College London (Ana Mijic Pepe Puchol-Salort)</p>	<p>These objectives look correct, although we would like to highlight the complexity of the urban planning system and how it will benefit from a systems-thinking approach perspective.</p> <p>We would advise to look at net-zero water as a way of design for new urban developments too.</p> <p>This links to the broader context of net-zero pollution that we are currently working on and would be happy to discuss this with you in more detail (see link: https://www.imperial.ac.uk/systems-engineering-innovation/carbon-neutral-to-net-zero-pollution/).</p>	<p>Support noted.</p> <p>The Council is currently in the process of a New Local Plan Review with the aim to adopt a New Local Plan in 2023. A key element of the work on the new plan will be to transfer the guidance outlined in this SPD into policy. We will aim to adapt the guidance in the Greening SPD into policy and improve upon the SPD where possible.</p> <p>We will explore the use of a systems-thinking approach as well as looking at net zero water</p>

Respondent Name	Comments	Council's Response
		objectives as suggested during policy formulation for the New Local Plan.
Diocese of London (Sue Lewin)	Executive Summary Pages 4 and 7. The definitions of 'zero carbon' and 'net zero' are vague and unsound. 'Zero carbon' would mean no GHG emissions at all (which is impossible), not just no net emissions. 'Net zero' means balancing emissions with CO2 and other greenhouse gases (GHGs) removed from the atmosphere, eg by tree planting or as a last resort offsetting. Renewables may reduce a site's emissions, but do not offset them except to the extent that renewable energy is exported for use elsewhere – usually electricity to the grid, or heat to a heat network.	Comment noted. The definitions of zero carbon and net zero carbon used in the SPD are those used in the New London Plan and the SPD has been produced in conformance with the New London Plan. The Council is required by national legislation to produce planning policy documents, such as this SPD that conform with higher tiers of planning policy. This includes the London Plan and NPPF.
Labour Group of Councillors (Mohammed Bakhtiar)	The Labour Group of Councillors in the Royal Borough of Kensington and Chelsea welcomes the Draft Greening SPD which is proposed by the council. This document is a big achievement and it contains some brave and new ideas which focus on minimising climate change impact, however we have some observations which we would like to share to improve our approach.	Support noted.
J Gardner	Two items missing from your draft Greening SPD are: - Retention and greening of front gardens - we have seen at least two or three front gardens just paved over in our neighbouring road and the loss of the	Comments noted. The retention of front and rear gardens is key for the borough both as they provide natural drainage and biodiversity. The Local Plan policy CE2i already refers

Respondent Name	Comments	Council's Response
	<p>visual greenery and landscaping is to the detriment of the area and mental wellbeing benefits from outdoor greenery and enjoying other people's gardens as you pass by. The SPD seems devoid of this and the current local plan does nothing to protect green front gardens, when surely they should be a key part of any greening SPD. I would also suggest that you revisit the basements SPD to ensure that gardens are actually retained as too often an entire garden with a path is replaced with tiles and a few small flowerbeds to fulfil the minimum planning condition. They are soulless front gardens and need protecting to help keep the borough green.</p> <p>- heat pumps - you need to cater in the SPD for the need for these to obtain planning permission and given the depth needed to site them in gardens to give consideration of siting, neighbours and the whole environmental impact as they are similar to digging a basement. Should heat pumps be allowed deeper than a basement dig or not? Preferably not. Should they be shown on plans submitted for approval along with information on how they operate, noise, impact on neighbours etc? With the cases we have seen, they haven't appeared on the plans nor submitted information at all and we don't understand why this is the case.</p>	<p>to the provision of permeable surfaces not only in front gardens but all landscaped areas.</p> <p>A section explaining the importance of gardens, their benefits and maintenance will be included in chapter 11, after the streetscape greening.</p> <p>We will also refer to permeable surfaces requirements in landscaped areas to be in line with policy CE2i. It is not permitted development to have impermeable paving in front gardens that are more than 5 sq.m.</p> <p>We will look for guidance on planting to refer to in the SPD although we should note that the type of plants used cannot generally be controlled by Planning.</p> <p>Regarding heat pumps, the Council is aware of the concern about noise and other nuisances associated with the implementation of new green technologies.</p> <p>Both ground and air source heat pumps are permitted development in most circumstances. The table on pg. 59-60 of section 9 of the SPD provides more detail on when planning permission is and is not required. Where planning permission is required the Council can place conditions to mitigate any harmful impacts. As such, we have set out the requirement for a noise and vibration assessment where air source heat pumps are proposed in section 7 of the SPD.</p>

Respondent Name	Comments	Council's Response
		<p data-bbox="1258 300 2011 402">We will change this text on pg. 39 to state when planning permissions is needed, we will require a noise and vibration assessment.</p> <p data-bbox="1258 430 2033 721">The SPD is focused on environmental issues, but other policies related to character and appearance of conservation areas and listed buildings will continue to apply. We have a statutory duty both for conservation areas and listed building, the SPD does not override that but will work in tandem. This is also established in relevant sections of the SPD (section 9 and 11 for example).</p> <p data-bbox="1258 746 2033 1152">Once adopted, the SPD will be a material consideration in determining planning applications, and it will work alongside other policies in the Local Plan. We need to acknowledge that the Government is now committed to phasing out gas boilers. From current technologies available the feasible options to householders will be heat pumps and therefore they need to be included in the SPD. Their impacts will need to be mitigated but it is also possible that other technologies emerge or improve as gas boilers are phased out.</p>

Section 2: Policy Context

Q2: Do you have any comments about section 2 of the SPD?

Respondent Name	Comments	Council's Response
Ladbroke Association (Sophia Lambert)	No.	Noted.
London Wildlife Trust (Mathew Frith)	Suggest to include, at least in Appendix 1: <ul style="list-style-type: none"> • Environment Bill/Act • London Urban Forest Plan (2020) https://www.london.gov.uk/sites/default/files/londonurbanforestplan_final.pdf	We will add the suggested documents to Appendix 1.
Michael Stock (Michael Stock)	Good	Support noted.
Gaunt	No	Noted.
Luisa Cicognani	It is missing the needs to EXPAND green areas and protect our parks and gardens. building up in parks and garden is NOT acceptable. also using materials and building constructions wchih are high energy users does NOT work. Hydrogen stations should be build and hydrogen has to be used mixed in gas pipes. STOP glass buidlings	Comments noted. The Council protects existing green and open spaces in the Borough through Policy CR5 of the current Local Plan. Policy CR5 also requires development to provide new high-quality green and open spaces where possible. The Greening SPD is intended to supplement the Local Plan rather than tacking its place or repeating policy. Section 3 and 4 of the SPD outline that all development should adhere to circular economy principles, the energy hierarchy and whole life cycle

Respondent Name	Comments	Council's Response
		<p>carbon approach, setting requirements for major development. These seek to encourage retention, reuse and recycling of existing buildings and materials and reduce carbon emissions associated with all stages of a building's life from construction to operation.</p> <p>The SPD is not intended to be an exhaustive list of all green, energy saving or carbon emission reducing/eliminating technologies the Council will support, but rather to establish green development principles to guide development across the Borough, in line with policy set out in the New London Plan.</p>
Sabine Laurent Varoutsi	None	Noted.
G Thomson	No comment	Noted.
KRACR (Chris Lenon)	Given the aims of the document, national government policy is set out clearly.	Support noted.
Environment Agency (Lisa Mills)	No comments	Noted.
DP9 (Dan Fyall)	All references throughout the SPD to the 'Publication London Plan' or 'Draft London Plan' should be updated if the 'New London Plan' (NLP) is adopted prior to adoption of the SPD.	<p>References to the draft New London Plan/Publication London Plan etc. will be updated to the London Plan, 2021.</p>

Respondent Name	Comments	Council's Response
Cornwall Mews South (West Side) RA (Philippa Jill Manasseh)	Many of the planning applications are given permission in direct contradiction to these aims which I support. What does the Council plan to do about this conflict.	Comment noted. Once adopted, the Greening SPD will form part of the Development Plan and will be a material consideration in determining planning applications. Its requirements will therefore apply to all new developments in the Borough. It cannot be applied retrospectively however.
V Rowlands	You could add references to the read across to active travel and healthy living policies from reducing pollution and encouraging walking and cycling.	Comment noted. Section 10 and 11 of the SPD set requirements and encourages development to support active and sustainable travel modes. The Greening SPD is intended to supplement the current Local Plan rather than taking its place or repeating policy. Relevant Local Plan policies have been listed in the SPD Appendix. Key themes and objectives of the Local Plan such as Chapter 24 – Respecting Environmental Limits and the promotion of sustainable and active modes of transportation such as cycling and walking over the private car (Policy CT1 for example) remain valid.
South Kensington Estates (Tim Butler)	No comments to add	Noted.
Ms Sarkis	In RBKC many of the below seem at a remove but the council can make mandatory increases in the three	Comments noted.

Respondent Name	Comments	Council's Response
	<p>below as relatively low cost and in the case of the middle one, buildings that pay back initial investment</p> <ul style="list-style-type: none"> • green public transport, cycling and walking • greener buildings • protecting our natural environment 	<p>Section 10 and 11 of the SPD set requirements and encourage development and buildings to incorporate green infrastructure and support active and sustainable travel modes. The Greening SPD is intended to supplement the current Local Plan rather than taking its place or repeating policy. Key themes and objectives of the Local Plan such as Chapter 24 – Respecting Environmental Limits, the promotion of sustainable and active modes of transportation such as cycling and walking over the private car (Policy CT1) and protecting existing green and open spaces (Policy CR5) remain valid.</p>
	<p>See above. Before spending on new build? New ideas please preserve the existing ones.</p>	<p>Comment noted.</p> <p>The Council is committed to supporting circular economy principles, in line with the New London Plan and this is described in section 3 of the SPD. The application of circular economy principles to the built environment aims to prioritise retention, reuse and recycling of the existing built environment over demolition and new build where appropriate.</p> <p>Planning can directly influence developments that need planning permission, nevertheless guidance is provided for existing buildings as well to promote best practice.</p>
<p>St Helen's Residents Group</p>	<p>RBKC needs to make sure it has divested from fossil fuel investments for its pension funds and so on.</p>	<p>Comment noted.</p>

Respondent Name	Comments	Council's Response
(Jenny Harborne)		<p>Unfortunately, the planning system and policy documents such as this SPD cannot impact elements of the climate change issue such as the Council's pension fund investments.</p> <p>However, the Council's Climate Change Team is working on producing a new Climate Emergency Action Plan, which will outline how the Council plans to meet its target of net zero carbon emissions for all Council operations by 2030. The pension fund investment plan will certainly be a key element of this.</p>
Cadogan Estates Limited (Jane Henshaw)	<ul style="list-style-type: none"> • 2.2: We are in agreement with plans. The stated £12m government investment appears to be an error as the government Ten Point Plan document states £12bn investment. As a local landowner we will be investing £20m over ten years in our decarbonisation and sustainability plans. • 2.3: We support the National Planning Policy Framework. We consider it is important that RBKC is seen in context of wider UK economy. For example, where greening is considered but local contributions within the borough are not feasible, offsite UK renewables with a supporting power purchase agreement should be encouraged • 2.4: We are supportive of the White Paper on Planning Reform, we have contributed to the consultation and will continue to do so 	<p>Support for the NPPF, White Paper on Planning Reform and the Government's Ten Point Plan noted and welcomed.</p> <p>The reference to £12 million in para. 2.2 (pg. 10) will be corrected to £12 billion.</p>

Respondent Name	Comments	Council's Response
Earl's Court Area Action Group (Bella Hardwick)	<p>“Sustainability Appraisal assesses the economic, environmental and social impacts of a proposed policy or plan, to ensure that it would contribute to achieving sustainable development. Development Plan Documents (DPDs) have to undergo Sustainability Appraisal, but Supplementary Planning Documents (SPDs) do not”.</p> <p>(https://www.nalc.gov.uk/library/publications/1634-planning-explained/file).</p> <p>Considering the above paragraph, how will the Council undergo Sustainability Appraisal? We believe Area Action Plans are essential, especially for major developments like the Earls Court Masterplan site. They give a geographic or spatial dimension and focus for the implementation of policies for that area. It involves the community from the outset and can lead to buy-in and ownership. It is also a way of introducing new policy where there is a gap. It can cover natural areas and climate change; decentralised energy; public space and green chain; transport infrastructure and parking and tall buildings.</p>	<p>Comment noted.</p> <p>As noted in your comment SPDs are not necessarily required to undertake sustainability appraisals. This was confirmed via consultation on a Screening assessment with statutory consultees. However, a sustainability appraisal was undertaken in support of the current Local Plan (2019), which this SPD is considered supplementary to. The Council is working on producing a New Local Plan, with the aim to adopt the new plan in 2023. The New Local Plan will contain policy informed by the SPD and we will undertake a sustainability appraisal to assess the impacts of these policies as part of the required evidence base for adoption of a new Local Plan.</p> <p>The issue of developing policies for Earl's Court and the best vehicle for doing that is a separate issue. However, the development goes forward it will need to comply with policies on environmental issues.</p>
CAMELLIA Research Project Imperial College London (Ana Mijic Pepe Puchol-Salort)	<p>It seems to include all the latest and more relevant policies related to urban greening and sustainability. Perhaps it should include the 25 Year Environment Plan too.</p>	<p>Support noted.</p> <p>We will add the 25 Year environment Plan to Appendix 1 of the SPD.</p>

Section 3: Circular Economy

Q3: Do you have any comments on section 3?

Respondent Name	Comments	Council's Response
Jane Whewell	<p>Can we suggest that the text on page 15 is redrafted to ensure that references to existing stock being unsuited to greening measures/modernisation, are not misused by developers to justify demolition of existing homes? At present we consider that the drafting could be cited by developers pursuing profit (eg demolition and rebuild avoids VAT whereas refurbishment does not) as providing justification for them to propose demolition of existing property in order to 'ensure the property is environmentally improved'. This would be harmful to the environment and harmful to the Borough and it is important that demolition/major demolition is not encouraged or facilitated through such text.</p>	<p>Comment noted.</p> <p>The Council is committed to supporting circular economy principles, in line with the New London Plan and this is described in the section 3 of the SPD. An assessment methodology detailed in the GLA guidance will need to be used. The key element for refurbishment will need to take into account if standards can be met or exceeded. Where viability is cited as a reason, this will be tested by the Council independently as we do at present.</p>
Ladbroke Association (Sophia Lambert)	<p>The circular economy Decision Tree at Figure 3.2 rightly includes the question "Is it technically feasible or viable to retain the buildings in whole or in part?" This is an area where we would like to see a much tougher policy. There have been a number of cases where perfectly good residential buildings have been pulled down to be replaced by new bigger buildings with the same number of residential units, to no apparent public benefit.</p> <p>We would like to see a presumption against demolition and rebuild, unless it can be demonstrated that it</p>	<p>Comment noted.</p> <p>The introduction of the circular economy principles, address some of the comments in relation to considering refurbishment/reuse over demolition and rebuild as described and referred to in the two examples provided. Policy has also been tightened to resist the loss of units.</p> <p>These aspects are further supported as we will also encourage all developments to apply the whole life cycle carbon approach, which seeks to ensure due regard is given to carbon emissions throughout the</p>

Respondent Name	Comments	Council's Response
	<p>would bring an environmental gain, such as greater energy efficiency, and/or some other public good such as an increased number of residential units.</p> <p>In judging the environmental gain, account needs to be taken of the environmental cost of the demolition, excavation and rebuild. All use energy and create environmental problems. Moreover, they are very apparent to residents. Objectors to planning applications frequently complain about the environmental effects of the construction and find it hard to understand why these are not taken into account.</p> <p>We therefore welcome the attempt take emissions into account - e.g. air pollution from lorry movements (including beyond the borough boundaries). But there are other environmental disbenefits from construction that need to be factored in when the environmental effects of a project are assessed – e.g. disposal of spoil (where we suspect there is a lot of bad practice that nobody is bold enough to check up on). The ideal way of factoring these costs in might be to look at some sort of “net present environmental value” over say a 20 year period. These are one-off costs and may be small in the overall scheme of things but they are very visible to residents and it needs to be demonstrated that they have been taken into account.. We accept, however, that this may be difficult to</p>	<p>lifetime of a building, from construction to operation. This is outlined in section 4 of the SPD and our requirements for this are again in line with those set by the New London Plan.</p> <p>Once adopted, the Greening SPD will be a material consideration in determining planning applications. Therefore, its requirements will apply to all new developments in the Borough.</p> <p>The circular economy and whole life cycle carbon approach concepts take demolition and construction waste into account, and this is outlined in the table on pg. 13-14 of section 3 of the SPD and para. 4.7 of section 4. More detailed guidance on this is provided in the GLA guidance on Circular Economy Statements.</p> <p>In addition, the Council requires all developments to submit a construction management plan and meet the requirements set out in our Construction Code of Practice (2019). This includes various restrictions and controls in line with relevant national and international standards, to ensure the impact on residents is limited as far as possible within the Council's planning powers.</p>

Respondent Name	Comments	Council's Response
	<p>achieve. But e.g. when comparing new build versus refurbishment, they should be included in some way, as should other environmental disbenefits such as loss of green space.</p> <p>Examples of recent questionable demolition and rebuild include:</p> <ul style="list-style-type: none"> • Duke's Lodge, a sturdy brick-built 1930s mansion block with 27 residential units and probably a life of several hundred years in front of it and green space around it. Planning permission was given on appeal for its demolition and replacement with the same number of much bigger residential units; a double basement and all that that entails in terms of spoil and energy use; and the building over of almost all the green space. The developers claim to have followed Passivhaus principles, so the new units are probably very much more energy efficient than the old ones. Against that, however, the new building extends over most of the green areas on either side of the old building and it has a number of features of purely private benefit such as a large swimming pool that will be using energy. All this needs to be thrown into the mix when making the comparison with what could have been achieved through retrofitting of the old building with the same number of residential units (with no swimming pool, gym etc). • 2, 4, 6 Lansdowne Rise, where planning permission 	

Respondent Name	Comments	Council's Response
	<p>was given for a terrace of three 1950s houses to be demolished and replaced by two larger houses. Despite the loss of a housing unit, the development was justified largely on the grounds that the buildings were not identified in the CAA as making a positive contribution to the conservation area. The buildings were far from an eyesore and well-built for the period. We would have liked to see a justification for their replacement in terms of sustainability gain.</p> <p>We note that newbuild is currently encouraged by the VAT arrangements and we hope the Council can lobby central government for changes.</p>	
London Wildlife Trust (Mathew Frith)	We support this.	Support noted.
Michael Stock (Michael Stock)	<p>This is of growing importance to cities and RBKC.</p> <p>It must also apply to keeping buildings in use for as long as possible rather than demolition and rebuilding eg Holiday Inn Cromwell Rd.</p> <p>I would have been interested in seeing how London & RBKC think examples such as Amsterdam's pioneering CE ambitions and plans could be incorporated here, possibly using Kate Raworth's Doughnut Economics for Cities</p>	<p>Support noted.</p> <p>The Council is currently in the process of a New Local Plan Review with the aim to adopt a New Local Plan in 2023. A key element of the work on the new plan will be to transfer the guidance outlined in this SPD into policy. This will be an opportunity to review the impact of the SPD and improve upon it where needed.</p> <p>We will explore how Amsterdam's CE ambitions and plans could be applied in RBKC in policy formulation for the New Local Plan.</p>

Respondent Name	Comments	Council's Response
	https://www.kateraworth.com/2020/04/08/amsterdam-city-doughnut/	
Greg Hammond	I very strongly support this idea, which should be embedded as a foundation of future developments.	Support noted.
Milner Street Area Residents' Association (Richard Grantley)	<p>4. We welcome the principle of the “Circular Economy”, where materials are retained in use at their highest value for as long as possible and are then reused or recycled, leaving a minimum of residual waste.</p> <p>5. Planning policy should therefore favour the use of traditional materials, e.g. brick and stone, as building using these materials these are longer lasting, and the materials are also easier to recycle.</p> <p>6. Planning policy should discourage or, better still, resist the construction of buildings with a shorter expected life. This would include buildings using materials such as steel, aluminium and glass. Buildings with these materials may only have a planned life of several decades, whereas many buildings with traditional materials built 100-200 years ago, or more, are still standing, and may last for centuries.</p> <p>7. Demolition of buildings made from traditional materials should generally be discouraged if there is a reasonable alternative.</p> <p>8. Where demolition of such buildings is permitted, it should be a standard requirement that any</p>	<p>Support for Circular Economy principles noted.</p> <p>A key objective of the Greening SPD is to encourage a shift away from unsustainable design and construction practises. The Council is supporting this through application of circular economy principles as outlined in section 3 of the SPD. As such, the Council will require applications for major development to submit a circular economy statement to ensure all opportunities to retain, reuse and recycle existing buildings and materials are taken. This requirement conforms with New London Plan policy.</p>

Respondent Name	Comments	Council's Response
	<p>replacement building reuse the materials. 9. Demolition behind retained facades should be resisted unless there is exceptional need. Such exceptions would not include the installation of a lift or the alignment of room levels at the rear with those at the front.</p>	
Gaunt	No	Noted.
Luisa Cicognani	<p>It is totally missing the need to build in a way that LASTS. a lot of new buildings do NOT have a design which is sustainable and that will last except with HUGE maintenance costs wasting materials and resources. every building application should show a calculation about HOW LONG the building is expected to LAST and what this entails in terms of maintenance work to avoid that the building looks bad and unsafe.</p>	<p>Comments noted.</p> <p>A key objective of the Greening SPD is to encourage a shift away from unsustainable design and construction practises. The Council is supporting this through application of circular economy principles as outlined in section 3 of the SPD. The application of circular economy principles to the built environment aims to prioritise retention, reuse and recycling of the existing built environment over demolition and new build where appropriate. It also builds for longevity.</p> <p>We also encourage all development to apply the whole life cycle carbon approach, which seeks to ensure due regard is given to carbon emissions throughout the lifetime of a building, from construction to operation. This is outlined in section 4 of the SPD and our requirements for this are again in line with those set by the New London Plan.</p> <p>Both section 3 and 4 of the SPD aim to encourage a long-term, sustainable approach to development,</p>

Respondent Name	Comments	Council's Response
		which will ensure that buildings are designed and constructed to last, with minimal waste.
Sabine Laurent Varoutsi	<p>Other ideas to facilitate a circular economy when conceiving new buildings and infrastructures:</p> <ul style="list-style-type: none"> - Design the new building to facilitate either composting on site or collection of organic waste to be sent in relevant facility - Design the new building drainage system to separate grey water from dark water and collect urine as it is proven that it could replace artificial fertilizers. See for instance: https://www.theguardian.com/society/2020/jan/22/study-gives-green-light-to-use-of-urine-as-crop-fertiliser 	<p>Suggestions noted.</p> <p>We agree with the importance of designing the new building drainage to separate water streams. Rainwater harvesting and greywater separation should be considered as part of Integrated Water Management Strategies required for major developments as explained in chapter 12 (page 88 under Our requirements Water Infrastructure).</p>
G Thomson	<p>ECDC supports the circular economy principles listed and agree with the requirement for major developments to be accompanied by a Circular Economic Statement.</p> <p>The decision tree at Figure 3.2 is a very helpful tool, asking highly relevant questions to inform the future of individual buildings, including whether retention of the building is “technically feasible and viable... in whole or in parts” and whether the existing building is “suited to the new use and requirements.”</p> <p>ECDC considers these questions to be a critical part of the decision making process and yet they are not referenced elsewhere in the SPD. The Council should explain in the supporting text that there will be certain</p>	<p>Support for circular economy principles and requirements for major development noted.</p> <p>The SPD does not repeat guidance elsewhere as it is already a long document and therefore while the decision tree flags up all the important aspects, developers will need to follow the detailed guidance on Circular Economy produced by the GLA.</p> <ul style="list-style-type: none"> a) Policy on site optimisation is elsewhere in the Local Plan in particular Policy CH1 and is applied rigorously due to the facts stated. b) Circular economy assessments will need to consider just this – refurbishment or redevelopment in environmental terms and

Respondent Name	Comments	Council's Response
	<p>circumstances where it may not be appropriate to refurbish or repurpose buildings. As well as the issues of feasibility and viability, the SPD should also consider:</p> <p>a) whether the site is currently being optimised, particularly in highly sustainable locations. The Council has publicly stated that it does not have sufficient land to meet its housing need and consequently, it should ensure that sites which can generate a significant uplift in floorspace are not constrained by the requirement to reuse inefficient buildings.</p> <p>b) whether the redevelopment of some buildings with poor fabric/systems (which would have high operational energy use and associated emissions) would be better for the environment over the lifetime of the building if its operational performance is significantly improved.</p> <p>c) if current and future anticipated energy legislation requirements would mean funding for both the initial capital expense and then the ongoing operational costs could be better deployed elsewhere to achieve more meaningful impact.</p> <p>d) consideration whether the spaces retained and improved can meet relevant health and wellbeing standards e.g. deep floorplates, low floor to ceiling heights.</p>	<p>financial viability in achieving these environmental standards.</p> <p>c) Offsetting is a last resort and is explained later in the SPD.</p> <p>d) These will be important considerations when looking at a proposal in the round.</p>
Rick Britt	Enforcing of the using of Circular Economy principles needs to be particularly strong; this in order to move developers away from a typical approach of knocking	Comment noted.

Respondent Name	Comments	Council's Response
	down what's there in order to put up the cheapest build with the maximum amount of cubic metres in the available space, this particularly in conservation areas.	This is a new principle and one that developers will need to increasingly follow as it is also a London Plan policy. Legislation requires that planning applications must be determined in accordance with the Development Plan which includes the London Plan and the SPD will be a material consideration when determining planning applications.
KRACR (Chris Lenon)	The requirements and the decision tree in 3.4 are clear. Residents have been concerned about the impact of redevelopments and these guidelines should address some of these concerns.	Support noted.
Environment Agency (Lisa Mills)	No comments	Noted.
DP9 (Dan Fyall)	Pg 12 under 'What is Circular Economy?': - Amend text to: ...'A Circular Economy is defined in paragraph 9.7.1 of the NLP as'... - Note the image currently blocks out the end of the paragraph text. The requirement for major applications to submit Circular Economy Statements is in accordance with NLP policy and the principles set out in Section 3 are supported.	Support and comments noted. We will amend the text as suggested and fix the issue with the image on pg. 12.
Cornwall Mews South (West Side) RA	I would define this as a very sophisticated version of recycling which I support but residents must be helped with this concept and its practice.	Support and comments noted.

Respondent Name	Comments	Council's Response
(Philippa Jill Manasseh)		
V Rowlands	No	Noted.
South Kensington Estates (Tim Butler)	We support circular economy principles for all developments	Support noted.
Ms Sarkis	Sounds good.	Support noted.
Kensington Society (Sophia Lambert)	<p>Section 3: Circular economy</p> <p>We are supportive of the statement defining circular economy, but felt it should give greater emphasis on the retention of existing buildings – for instance this should be the first principle, not the second, in the “Key Guidance” box at the beginning. In a borough as built up as Kensington and Chelsea, the great majority of new construction inevitably involves demolition of an existing structure. It should be a requirement that any application for a project involving demolition should include a statement showing that replacement will bring greater environmental benefits than refurbishment, unless there are substantial other public benefits such as extra housing or new medical facilities.</p> <p>New build has an enormous VAT advantage which the Council should be lobbying central government to address. It is also easier to predict costs with new-</p>	<p>Support for circular economy principles and comments noted.</p> <p>The first bullet under key guidance is simply stating what Circular Economy is which seems to be the logical starting point. It may be confusing to swap the two bullets. All major developments will be required to demonstrate Circular Economy principles. It will not be proportionate to have these requirements for smaller scale developments.</p> <p>Lobbying Government re VAT advantage of new builds is beyond the scope of the SPD, but the comment is noted. The Council does seek independent advice on viability appraisals and therefore the costs of rebuild and refurbishment will be tested by the Council as described.</p>

Respondent Name	Comments	Council's Response
	<p>build. So developers will employ consultants to "prove" that rebuild is better than refurbishment. We think that the Council may under-estimate the in-house expertise it will need to assess applications and to monitor and advise on compliance.</p> <p>A lot of the information relates to new build and major projects which in RBKC are few and far between. On major projects developers will employ an army of consultants, so the criteria will at least be understood and considered. On smaller projects or householder projects those skills might well not be available. It will therefore be important that there is suitable and accessible guidance for householder applications.</p>	<p>We will be producing a separate guide accompanying the SPD aimed at householders.</p>
<p>St Helen's Residents Group (Jenny Harborne)</p>	<p>Try to get the government to remove VAT from reusing existing buildings</p>	<p>Comment noted.</p>
<p>Cadogan Estates Limited (Jane Henshaw)</p>	<ul style="list-style-type: none"> • “Sustainable sourcing” has a wide interpretation and should be carefully defined, perhaps aligning with the definition of Responsible Sourcing used by BREEAM. • We agree with the principles of the Decision Tree (figure 3.2 on page 15) however the expected life of a building should be clarified. It is recommended that generally development should be ‘long term’, clarified as 80-100 years. • The circular economy should be seen in context of 	<p>Comments and suggestions noted.</p> <ul style="list-style-type: none"> • The Circular Economy Statement Guidance published in March 2020 and updated in October 2020 by the GLA sets out the definition of sustainable sourcing as follows. <i>“sustainable sourcing, or ‘responsible sourcing’ as it is also commonly known, addresses a range of issues, including but not limited to material traceability, health and safety, and environmental management through the supply chain; energy, resource and water use, greenhouse gas emissions, and</i>

Respondent Name	Comments	Council's Response
	<p>the wider UK economy, encouraging collaboration across the UK. For example, trying to facilitate materials reuse solely within RBKC would require large, expensive and impractical space for storage.</p>	<p><i>ecotoxicity. Responsible sourcing is described in standard BES 600121 (https://www.bsigroup.com/en-GB/bes-6001-responsible-sourcing-of-construction-products/).</i></p> <ul style="list-style-type: none"> • Section 2.2 of the Circular Economy Statement Guidance also states, “<i>a building or development can be understood in terms of ‘layers’, where each layer has its own life-cycle</i>”. It goes on to say, “<i>For example, the structure of a building will typically be designed to last for 100 years or more whilst features like the façade may be replaced two or three times over the life of a building</i>”. The idea is that circular economy principles are applied to each component of a development but para. 2.2.2 of the GLA guidance states that generally a building’s structure is designed to last for 100 years or more. • The Council maintains partnerships with other boroughs across London and beyond to allow us to collaborate on strategic issues such as transport, housing and waste management. This will be outlined in our Statement of Common Ground, to be produced as part of the evidence base for the New Local Plan. We will continue to foster current relationships and develop new partnerships to support strategic objectives going forward.

Respondent Name	Comments	Council's Response
<p>Earl's Court Area Action Group (Bella Hardwick)</p>	<p>Criticisms of the circular economy include a lack of the social dimension and its lack of strategic guidelines and standardisation. (https://www.circular.academy/circular-economy-critics-and-challenges/)</p> <p>How will the Council keep up to date with the international circular economy standards that are being created and incorporate these into the SPD? For example, ISO/TC 323 Circular Economy. (https://www.learn2improve.nl/circular-economy/)</p>	<p>Comments noted.</p> <p>The principles set out the SPD are consistent with implementing the EU waste hierarchy and with the circular economy systems thinking approach developed by the Ellen MacArthur Foundation (EMF). The objectives and requirements of the Greening SPD, including those in section 3 relating to the circular economy, are set out as such to align the Council's greening policies with the New London Plan, as required by current planning legislation.</p> <p>In addition, the Mayor recently consulted on his circular economy statement guidance document, which will provide more information on the standards sought by circular economy statements.</p> <p>We acknowledge that applying circular economy principles to the built environment is highly complex and the Council will monitor how the requirements in the Greening SPD work in practise and aim to adapt policy where needed as we move forward. To that end, the Council is also in the process of a New Local Plan Review with the aim to adopt a New Local Plan in 2023. A key element of the work on the new plan will be to transfer the guidance outlined in this SPD into policy. This will be an opportunity to review the impact of the SPD and improve upon it where needed.</p>

Respondent Name	Comments	Council's Response
<p>CAMELLIA Research Project Imperial College London (Ana Mijic Pepe Puchol-Salort)</p>	<p>This is a very interesting and innovative section. It will be challenging to see how circular economy is applied at small scale developments (and particularly those ones with historic heritage). We would advise to look at the concept of Doughnut Economics from Kate Raworth for ideas around integrated planning in the context of socio-economic development (https://www.kateraworth.com/).</p> <p>Good examples of circular economy are found in the Netherlands, a country that is already applying the circular economy principles to some of their urban planning policies in their main cities.</p>	<p>Comments noted.</p> <p>The Council is currently in the process of a New Local Plan Review with the aim to adopt a New Local Plan in 2023. A key element of the work on the new plan will be to transfer the guidance outlined in this SPD into policy. This will be an opportunity to review the impact of the SPD and improve upon it where needed.</p> <p>We will explore the concept of Doughnut Economics and examples of circular economy principles in practise in policy formulation for the New Local Plan.</p>

Section 4: Energy Hierarchy and the Whole-Life Cycle Approach

Q4: Do you have any comments on section 4?

Respondent Name	Comments	Council's Response
Ladbroke Association (Sophia Lambert)	No.	Noted.
London Wildlife Trust (Mathew Frith)	We support this.	Support noted.
Michael Stock (Michael Stock)	Excellent.	Support noted.
Greg Hammond	The Whole-life Cycle Approach is essential and I warmly welcome its inclusion. Without it, assessments of new developments would be completely distorted.	Support noted.
Natural England (Victoria Kirkham)	<p>Green Infrastructure This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area.</p> <p>The National Planning Policy Framework states that local planning authorities should 'take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure'. The Planning Practice Guidance on Green Infrastructure provides more detail on this.</p> <p>Urban green space provides multi-functional benefits.</p>	<p>Sections 11 and 13 of the Greening SPD provides detailed guidance on providing green infrastructure and enhancing biodiversity through development, setting out the requirement for all major new residential development to meet an urban greening factor score of 0.4 and 0.3 for non-residential development, as well as 10% biodiversity net gain.</p> <p>The Greening SPD is intended to supplement the current Local Plan, rather than replacing or repeating policy. The current Local Plan contains policies that support the provision of green infrastructure within development and seek the protection and</p>

Respondent Name	Comments	Council's Response
	<p>It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities.</p> <p>There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through:</p> <ul style="list-style-type: none"> • green roof systems and roof gardens; • green walls to provide insulation or shading and cooling; • new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity). <p>You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.</p> <p>Further information on GI is include within The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and</p>	<p>enhancement of existing green infrastructure, biodiversity and habitats (Policy CR5, CR6 and CE4 for example).</p> <p>The Council produced a Screening Statement on the Greening SPD in July 2018. As per the relevant regulations, Historic England, Natural England and the Environment Agency were consulted on this Screening Statement. This consultation period ran from 3 July 2018 to 8 August 2018. The Council received responses on the Screening Statement from the three consultation bodies. All confirmed that a Strategic Environmental Assessment or Sustainability Appraisal was not required.</p> <p>The Council's final Screening Opinion, after consulting the consultation bodies and taking into account the criteria specified in Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004, is that the Greening SPD does not require a SEA/SA. The reasons are set out in the Screening Statement (July 2018). This response can be found on our webpage: https://planningconsult.rbkc.gov.uk/consult.ti/GreeningSPD/consultationHome) under Supporting Documents.</p>

Respondent Name	Comments	Council's Response
	<p>Biodiversity".</p> <p>Biodiversity enhancement This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.</p> <p>Landscape enhancement The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might makes a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.</p>	

Respondent Name	Comments	Council's Response
	<p>For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.</p> <p>Other design considerations The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 180).</p> <p>Strategic Environmental Assessment/Habitats Regulations Assessment A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p>	
Gaunt	No	Noted.

Respondent Name	Comments	Council's Response
Luisa Cicognani	The hierarchy does not clarify what can be done. buildings can use better windows EVEN in listed buildings. better insulation in roofs. can use hydrogen in gas pipes ad can ensure that water is not wasted.	<p>Comments noted.</p> <p>Section 4 is intended to set out the high-level principles of the energy hierarchy. Sections 5 – 8 of the SPD then describe in more detail what can be done to ensure high standards of energy performance in new development. Additionally, section 9 of the SPD outlines a range of retrofitting interventions that can be introduced to improve the energy performance standards of existing properties, including listed buildings and those located in designated conservations areas. This includes guidance on windows.</p> <p>The SPD is not intended to be an exhaustive list of all interventions and technologies the Council will support, but rather to establish green development principles that will guide development across the Borough, in line with New London Plan policy requirements.</p>
Sabine Laurent Varoutsi	none	Noted.
G Thomson	The guidance in the SPD is in line with the wider GLA guidance on the WLC approach and the new Be Seen guidance. The principle of submitting a WLC Assessment is supported in this regard. The legal obligations related to reporting WLC upon completion of buildings in large scale masterplan development would benefit from further explanation as	<p>Comments noted.</p> <p>The purpose of WLC reporting upon completion is to monitor and understand any performance gaps between design and delivery of a development. This is</p>

Respondent Name	Comments	Council's Response
	the intent is unclear. Reflecting on the phased nature of masterplan development the obligations can extend to future third parties and therefore clarity in relation to the purpose of the reporting would be beneficial.	established on pg. 18 of the SPD, under Our Requirements. Please also see section 4.3 of the GLA guidance on Whole Life Cycle Carbon Assessments, published in October 2020 for more detail on what information is expected to be submitted.
Rick Britt	In my area I note a substantial number of properties being completely refurbished top to bottom inside and out in order to increase their value prior to being sold; then the new owner immediately refits the building again! So wasteful, how can this be discouraged?	Comments noted. Some retrofitting/refit works, particularly those of an internal nature as described, do not require planning permission, and therefore, the Council cannot control these activities through its planning powers. However, we have included guidance encouraging homeowners to follow more sustainable methods/standards and tailor refurbishment to the type of building.
KRACR (Chris Lenon)	The Society can support the aim of improving energy efficiency in the built environment. Given the divergence of views in the Society some members may not agree with Fig 4.1, while some will endorse it.	Noted.
Environment Agency (Lisa Mills)	No comments	Noted.
Fernando Lobo	Positive. There needs to be more emphasis on methods of	Comments noted.

Respondent Name	Comments	Council's Response
	<p>construction as well.</p> <p>Sometimes minimizing just to fit the law will result in corner cutting. The Borough should pursue completely carbon neutral construction plans. Any new construction or development project must contain within its mission to promote carbon neutrality.</p>	<p>The objective of applying the whole life cycle carbon approach, as outlined in section 4 of the SPD is to reduce carbon emissions at all stages of a development's lifetime, including embodied emissions generated during the construction phase.</p> <p>In accordance with the requirements of the New London Plan we will require major development to be accompanied by a whole life cycle assessment, which should demonstrate how reducing carbon emissions has been considered at all stages of the proposal.</p>
DP9 (Dan Fyall)	<p>The requirement to follow the NLP Energy Hierarchy and for strategic developments to undertake a Whole Life-Cycle Carbon Assessment is in accordance with relevant NLP policies/guidance and the principles set out in Section 4 are supported.</p> <p>Pg 18 - the recognition that relevant, referenced guidance is subject to consultation/change and that the 'latest GLA guidance should be followed' provides necessary flexibility and is welcomed.</p>	Support noted.
Cornwall Mews South (West Side) RA (Philippa Jill Manasseh)	<p>A little example here of conflict. The Council had a scheme to assist with solar panels . I expressed an interest but as the council required me to get planning permission, I have a flat roof and my mortgages forbade it the whole thing was a non starter. People need help to be green.</p>	<p>Noted.</p> <p>This Council supports the use of solar panels where appropriate and has provided advice for householders and applicants on the use of solar panels in sections 7 and 9 of the SPD. However, as explained in section 9, in the case of listed buildings or properties located within conservation areas. These must be dealt with on a case by case basis to determine how the</p>

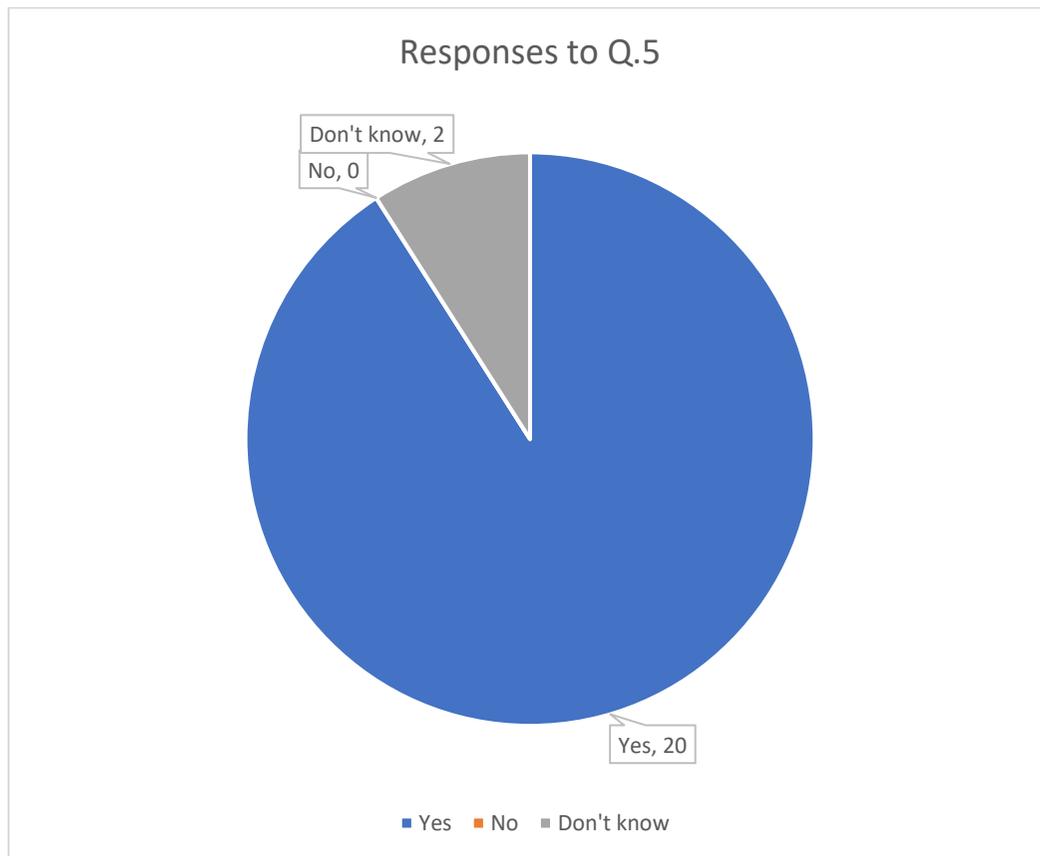
Respondent Name	Comments	Council's Response
		installation of solar panels may impact the special heritage interests of the property itself or the character of wider conservation area.
V Rowlands	No	Noted.
South Kensington Estates (Tim Butler)	We support consideration of energy hierarchy and submission of whole lifecycle assessment to ensure developments minimise carbon footprint	Support noted.
Ms Sarkis	Sounds good.	Support noted.
Kensington Society (Sophia Lambert)	<p>Section 4: Energy hierarchy and whole life-cycle approach</p> <p>It is stated in the box at the beginning that "All developers are encouraged to follow the principles for reducing whole life cycle carbon emissions." How is one encouraged?</p> <p>Para 4.5 says that Life-cycle Assessment is a multi-step procedure through the life stages of a building:"</p> <p>Many buildings are built to a level of interior construction which is basically a blank box and the tenant then fits out the interior. Mechanical systems are adapted to the tenant's needs and major works which will affect the running of the building are done. Often such changes will not need planning permission. Developers sell on. Elsewhere in the document it says monitoring will end at 5 years. More thought needs to</p>	<p>Comments noted.</p> <p>The word encouraged has been used as a guide for all developments but as outlined in section 4, major development will be required to produce a whole life cycle assessment. This is because it is not a proportionate requirement for smaller scale development and not one that can be introduced in an SPD.</p> <p>It is a valid point that in commercial development fit outs may take place later. However, a large-scale development to which the policy applies will need plant and machinery built in from the start. We acknowledge that there will be limits to what planning policy can control and policy will not apply to works like internal fitting which do not require planning permission.</p>

Respondent Name	Comments	Council's Response
	<p>be given to how true life-time monitoring can be achieved.</p> <p>There are references in this chapter (e.g. para 4.7) to the “designer” being responsible for minimising construction waste etc. We think it important that the word "developer" be used to emphasise that responsibility rests squarely with the developer.</p> <p>Waste disposal is likely to be a continuing problem, and there need to be some rules on what is a “suitable” way of disposing of waste and of checking that the disposal has been carried out as planned.</p>	<p>We will change para 4.7 to state designers/developers.</p> <p>Managing construction waste sustainably is key to the whole life cycle carbon approach and circular economy concepts. This is outlined in para. 4.7 of section 4 of the SPD and the table on pg. 13-14 of section 3. The GLA guidance on Circular Economy Statements and provides more detail on this.</p>
Cadogan Estates Limited (Jane Henshaw)	<ul style="list-style-type: none"> • Cadogan will be measuring the embodied carbon and forecast operational energy use intensity of all development projects in order to comply with our own Net Zero targets. • Further clarification on the anticipated use of a post-construction WLCA would be welcomed. Submitting such information for monitoring and research purposes is welcomed as this can aid understanding and principles going forward for future development, however there needs to be an understood purpose and outcome of the assessments. Such assessments will be costly to undertake, so having an overall intent will be necessary to justify the investment. We would appreciate more clarity of the recourses in the event that the post construction WLCA differ from that 	<p>Comments noted.</p> <p>The GLA is responsible for setting the guidance on whole life cycle carbon assessments and they recently consulted on a supplementary guidance document covering this.</p> <p>The purpose of WLC reporting upon completion is to monitor and understand any performance gaps between design and delivery of a development. This is established on pg. 18 of the SPD, under Our Requirements.</p> <p>Please also see section 4.3 of the GLA guidance on Whole Life Cycle Carbon Assessment, published in</p>

Respondent Name	Comments	Council's Response
	<p>submitted at the planning stage.</p> <ul style="list-style-type: none"> • If the purpose of the post construction WLCA is to identify any deficiency in meeting the original carbon saving estimates and the consequential carbon offset cost, it is also important that there is an opportunity to capture back incurred offsetting fees where the carbon saving is better than the sum of the carbon offset originally paid. 	<p>October 2020 for more detail on what information is expected to be submitted.</p> <p>The Council accepts that there will need to be an opportunity to capture back incurred offsetting fees where the carbon saving is better than the sum of the carbon offset originally paid.</p>
Earl's Court Area Action Group (Bella Hardwick)	No	Noted.
CAMELLIA Research Project Imperial College London (Ana Mijic Pepe Puchol-Salort)	<p>LCA (Life Cycle Assessment) methods are proved to be very useful and informative; however, it would be crucial to identify what are the most reliable evaluation tools for this type of system at different urban scales. This theme is one of the priorities for our work in the Centre for Systems Engineering and Innovation (CSEI) at ICL. We would be happy to work with you on development of LCA approaches for urban planning (https://www.imperial.ac.uk/systems-engineering-innovation/Infrastructure-Lifecycles/)</p>	<p>Suggestions noted.</p> <p>We will be grateful for the input of the research team at Imperial to assist with WLCA while developing the New Local Plan.</p>

Section 5: Reduce Energy Demand (be lean)

Q5: Do you support the extension of Local Plan Policy CE1 to include a requirement for net zero carbon not only for major residential development but also to major non-residential development (London Plan Policy SI2 C)?



If not, can you please explain what the standards should be bearing in mind that they should be supported by evidence?

Respondent Name	Comments	Council's Response
Jane Whewell	<p>We note that the document highlights that significant amounts of glazing - particularly in walls that face the sun - creates significant overheating problems. However, the document does not address the issues this causes, nor the fact that those who seek to install large amounts of glass inevitably also apply for air-conditioning to be installed. This air-conditioning is hugely energy intensive and highly wasteful and it is counterintuitive and unhelpful for this document to highlight the problem of glazing causing overheating while</p> <p>a) not addressing it by discouraging / limiting the amount of sun facing glazing or requiring filters to be placed on glass to block rays that generate heat</p> <p>b) not making clear that air-conditioning will be discouraged / not permitted where the design of the house is likely to result in overheating e.g. due to excessive glass in the sun facing wall.</p> <p>We would ask that measures to limit excessive glazing/require overheating to be controlled by passive measures rather than air-conditioning be introduced.</p> <p>More generally we consider that significantly more attention should be paid in the document to challenging and reducing the installation of air-</p>	<p>Comments noted.</p> <p>Section 5 of the SPD explains the risks associated with overheating and provides guidance on how this risk can be mitigated (para 5.31 to 5.33) through optimising the design of a building. It also outlines our requirement that the energy assessment submitted with an application must demonstrate how the risk of overheating has been considered.</p> <p>The objective of section 5 is net zero carbon for major new development. It therefore follows that the use of air conditioning is contrary to this objective. In addition, para. 5.33 of the SPD explicitly states that passive ventilation should be prioritised, and the increased use of air conditioning is not desirable.</p> <p>Section 5 of the SPD is not intended to be an exhaustive list of all interventions that can reduce the energy demand of buildings, but rather to establish the principle that all new major development must be designed to be net zero carbon. In setting this requirement we are effectively discouraging energy intensive forms of heating and cooling such as air conditioning.</p>

Respondent Name	Comments	Council's Response
	<p>conditioning given the harmful impact it has. For example, it would be helpful to encourage reductions in variation of temperature within homes through design. Where homes are designed appropriately and with good modern insulation occupiers should require far less heating and cooling throughout the year thus significantly reducing energy use and harmful impacts of climate change.</p>	
<p>Milner Street Area Residents' Association (Richard Grantley)</p>	<p>10. We strongly agree that air conditioning should be avoided for residential development. In particular, we agree with the statement (para 5.33) that "passive ventilation" should be prioritised, taking into account external noise and air quality considerations in determining the most appropriate solution".</p> <p>11. Commercial buildings should also be designed to reduce reliance on air conditioning. Glass should be a maximum of 40% of any façade, and all windows should be capable of being opened.</p>	<p>Support for passive ventilation noted.</p> <p>The requirements of section 5 extend to non-residential development as well.</p>
<p>G Thomson</p>	<p>ECDC agrees with this approach which is consistent with the London Plan.</p>	<p>Support noted.</p>
<p>Environment Agency (Lisa Mills)</p>	<p>We welcome the inclusion of BREEAM within this SPD. Water resources should also be prioritised when considering effective housing delivery. Water Resources. The London Plan describes a need for "new dwellings to meet the Building Regulations optional requirement of 110 litres per person per day for water consumption". Additionally, we recommend</p>	<p>Support for inclusion of BREEAM noted.</p> <p>The Council is currently in the process of a New Local Plan Review with the aim to adopt a New Local Plan in 2023. A key element of the work on the new plan will be to transfer the guidance outlined in this SPD into</p>

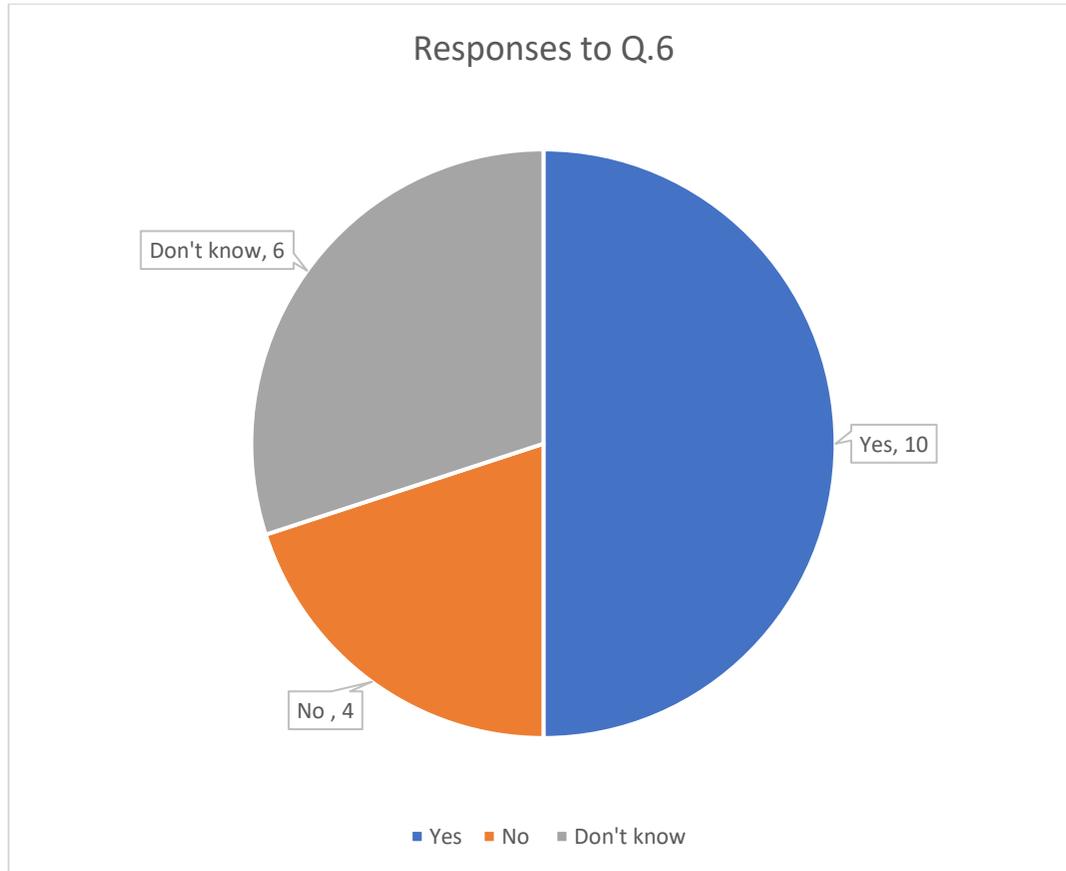
Respondent Name	Comments	Council's Response
	<p>that new non-residential commercial buildings are required to achieve a BREEAM 'excellent' rating for water efficiency (or an equivalent rating with any successors). We strongly recommend the retrofitting of existing buildings where opportunities arise through refurbishments and changes of use. There are a number of BREEAM Technical Standards documents to support retrofitting for commercial and residential buildings we recommend you refer to.</p> <p>The London Plan (draft 2019) has described climate change as an 'unprecedented challenge', combined with the challenges of the increased levels of growth putting pressure on land, housing, infrastructure and the environment. It also states that a responsible city must limit its impact on climate change while adapting to the consequences of the environmental changes. We welcome the reference and inclusion of the ambition for reducing contributing to climate change, including a focus on becoming a zero carbon borough by 2050 in line with the London Plan (draft 2019) in this SPD. It should also encourage the provision of high quality open spaces within land use decisions and the promotion and provision of cycling and walking infrastructure and greener transport. New buildings and infrastructure should utilise smart technologies and low carbon energy sources, make efficient use of water, reduce the impacts from natural hazards like</p>	<p>policy. This will be an opportunity to review the impact of the SPD and improve upon it where needed.</p> <p>Building Regulations for water efficiency will apply regardless of planning policy.</p> <p>Para. 23.3.6 of the Local Plan states London Plan policy requires designing residential development so that mains water consumption would meet a target of 105 litres or less per head per day. This reflects the 'optional requirement' set out in Part G of the Building Regulations... the 'optional' requirement applies to new residential development in the borough.</p> <p>We will explore adding requirements for water efficiency in line with BREEAM as suggested in policy formulation for the New Local Plan.</p> <p>The Greening SPD is intended to supplement the current Local Plan and does not repeat those policies. Key themes and objectives of the Local Plan such as Chapter 24 – Respecting Environmental Limits, the promotion of sustainable and active modes of transportation such as cycling and walking over the private car (Policy CT1), the protection and provision of green and open spaces (Policy CR5) will continue to apply.</p> <p>The SPD also contains policy, requirements and guidance that seek to encourage the use of low carbon energy sources (section 6), reduce the impacts of</p>

Respondent Name	Comments	Council's Response
	flooding and heatwaves, while mitigating and avoiding contributing to the urban heat island effect.	natural hazards such as flooding (section 12) and heatwaves, while mitigating and avoiding contributing to the urban heat island effect (section 5) in new buildings. Most of these are also policy objectives of the current Local Plan.
Kensington Society (Sophia Lambert)	<p>Section 5: Reduce energy demand (be lean) We are concerned at the restriction to “all our major developments both residential and non-residential”. With the definition of “major” set so high the targets will never be reached as most will be below the definition of “major”.</p> <p>Para 5.16 states the use of Passivhaus is for new build, but included in the document (para 5.19) is a house at 100 Princedale Road which has been retrofit and certificated to the Passivhaus standards. So, it is not only for new build. Some effort should be made to say in what circumstances Passivhaus can be applied to existing buildings.</p> <p>Para 5.27 says: “Reasons for performance gap as discussed in the London Energy Transformation Initiative (LETI) Guide for Climate Emergency Design Guide, 201912 are as follows. They include errors in design calculations, substitution of material between design and build, poor insulation, poor coordination between designers and contractors, poor standard of installation and overheating due to sub-optimal design.”</p>	<p>Comments noted.</p> <p>The requirements in the SPD/policy have to be proportionate to the scale of evidence and supported by evidence. We do not have the evidence to apply onerous requirements on small scale development where meeting current building regulations may suffice. However, we have provided good practice guidance for all scales of developments.</p> <p>It is correct that Passivhaus is for new build but Passivhaus certification is also possible for very low energy retrofit projects. EnerPHit is a slightly relaxed standard for retrofit projects, where the existing architecture and conservation issues mean that meeting the Passivhaus standard is not feasible. This may have been the case in the example shown. Enerphit is also described in the SPD.</p> <p>Section 5 of the SPD provides guidance on Passivhaus, which we are encouraging as a voluntary standard. However, applicants or householders should seek expert advice when considering implementing the voluntary standards, as each development will be</p>

Respondent Name	Comments	Council's Response
	<p>All too often the builder's price is agreed on a general specification and the builder will revise the specification for cost savings. The designer most often is not even employed at this stage. The Design and Build process to be revised so that where the builder varies a specification the design and specification must approved.</p> <p>Para 5.28 says: "LETI recommend three pillars to close the performance gap. These recommendations are aimed at developers/designers to..."</p> <p>Again, it is not the designer but the developer who should have this responsibility. Often the designer is gone before construction especially if Design and Build.</p>	<p>unique depending on the property type and context of the site. It is not possible for the SPD to provide detailed guidance that covers all potential circumstances.</p> <p>The reference to designers is simply quoting text from the LETI guide.</p>
Cadogan Estates Limited (Jane Henshaw)	<p>In principle, we are supportive of a reasonable operational net zero carbon approach, as opposed to an embodied net zero carbon approach.</p> <p>In practice, we have significant concerns about the quantum of the offset costs and how this may impact on the viability of development schemes.</p> <p>To assist in our own understanding of the proposed standards, we calculated the cost of the water-to-water pump heating system at 196 – 222 King's Road. This sustainable and efficient system alone will emit 94 tCO2e/year and would result in an offset payment of</p>	<p>Comments and concerns noted. However, the carbon offset costs have been set by the GLA in the New London Plan. We have required net zero carbon for major residential developments for a number of years with offsetting costs of £60 per tonne of carbon.</p> <p>Regarding voluntary energy standards, this is a relatively new and emerging field of policy for RBKC and we don't yet have examples of new development given permission that has been implemented them.</p>

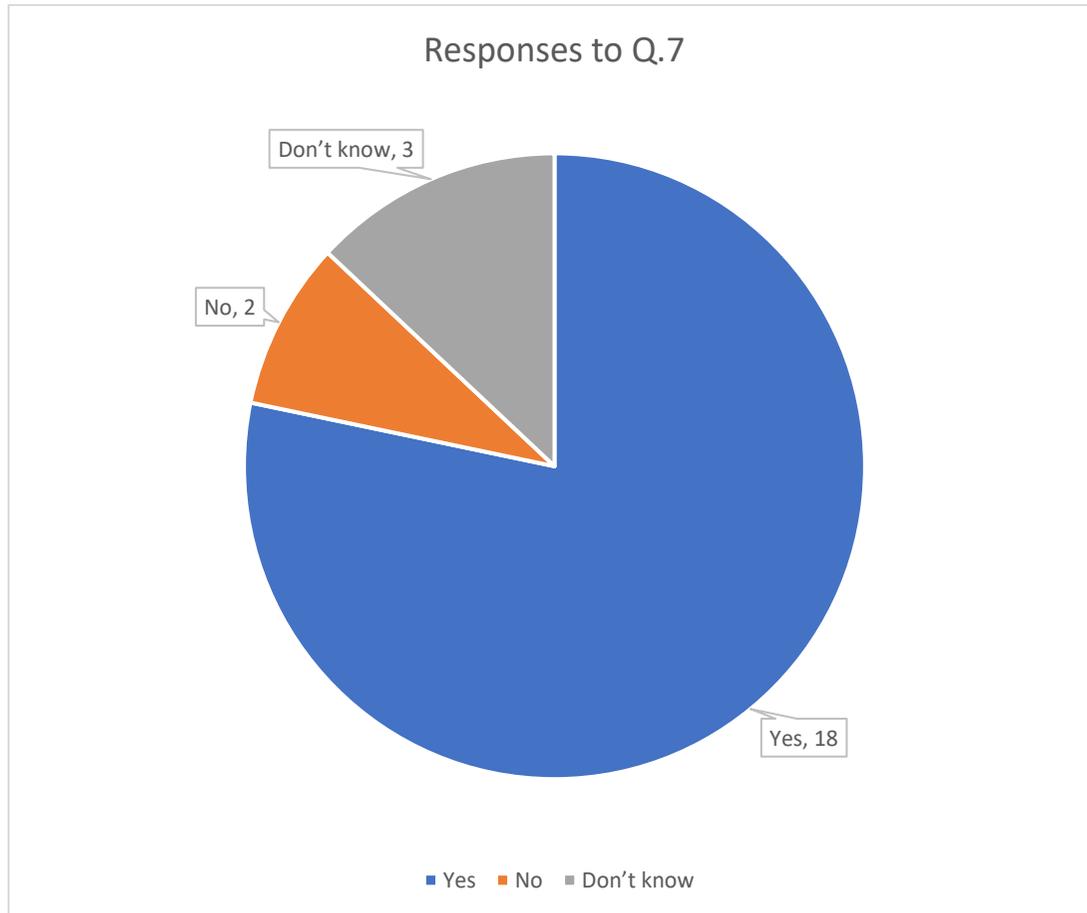
Respondent Name	Comments	Council's Response
	<p>£8,930 a year or £267,900 over 30 years. These costs are absolutely prohibitive, particularly when taking into account that this is only part of the operational cost.</p> <p>The guidance details the benefits of voluntary third-party certification, such as Passivhaus Standards and EnerPHit.</p> <p>We would like to see references to equivalent third party standards such as Passivhaus and EnerPHit being approved, to allow for flexibility. We would like to see references to equivalent third party standards such as Passivhaus and EnerPHit being approved, to allow for flexibility.</p> <p>We endorse the flexibility associated with the voluntary approach to adopting these standards. Such standards can be difficult to incorporate within every redevelopment scheme.</p>	

Q6: Are the requirements to demonstrate meeting the standards robust and clear.



Voluntary Standards and Assessment Methods

Q7: Do you think that voluntary industry standards and assessment methods such as Passivhaus, EnerPHit and Energiesprong should be encouraged by the Council?



Q8: Do you have any other comments on section 5?

Respondent Name	Comments	Council's Response
Ladbroke Association (Sophia Lambert)	External shutters are rarely suitable for retrofitting in conservation areas. But there is no doubt that they are an extremely efficient form of insulation against both heat and cold. Where they can be built into the design of a new build, we think they should be encouraged. To protect against summer heat, shutters with louvres are likely to be particularly effective if they can be used with open windows – as is the norm in hotter parts of Europe.	Suggestion noted. Paragraph 9.24 encourages the use of shutters particularly and states that <i>“Well fitted external or internal wooden shutters also dramatically decrease heat loss through windows. Redundant shutters should certainly be brought back to use wherever possible and if missing, consideration given to reinstating them. Where there is no clear evidence of previous shutters then the merits of installation will be weighed against the impact on the significance of the building if it is listed.”</i>
London Wildlife Trust (Mathew Frith)	We support the requirements set out.	Support noted.
Michael Stock (Michael Stock)	Very impressive. Excellent to see references to Energiesprong.	Support noted.
Gaunt	No	Noted.
Luisa Cicognani	The overall reduction in energy demand comes from the design of new building and retrofitting old ones that CAN LAST. this is NOT covered	Comments noted. Section 5 does include guidance on how the design of new development can be optimised to reduce energy demand, and section 9 of the SPD sets out in depth guidance on a range of retrofit interventions for existing buildings.

Respondent Name	Comments	Council's Response
Sabine Laurent Varoutsi	none	Noted.
G Thomson	<p>ECDC supports the opportunity to use alternative methods to meet energy efficiency requirements at the 'Be Seen' step of the energy hierarchy. ECDC would support greater flexibility in relation to compensation for residual carbon emissions resulting from development. Whether this be in the form of carbon off-setting or off-site initiatives directly attributable to the development in question. ECDC does not agree with limiting alternative offsetting arrangements to schemes within the Borough as it could preclude the use of other recognised schemes such as bio-energy carbon capture and storage on London's Green Belt. On the basis that the Borough is highly constrained, by both its size and the prevalence of heritage assets, there may be more effective opportunities available beyond its boundary. This will be particularly important at Earls Court as the Site extends over two boroughs. The SPD should offer some flexibility for bespoke arrangements to be considered.</p> <p>With regards to carbon off-setting payments, the Council should provide transparency / evidence of projects that will be funded and details of the benefits realised. This is necessary to underpin the Borough's £/tonne figure if it is decided to deviate from the London Plan £/tonne figure.</p> <p>The SPD should also recognise that there are</p>	<p>Comments noted.</p> <p>The Council has a target to be carbon neutral in its own operations and a carbon neutral Borough by 2040. Therefore, we prefer offsetting to be done within the Borough. However, the SPD is flexible in that carbon can be offset off-site or as a payment.</p> <p>To accord with the requirements of the London Plan, from the 1st April 2017, the Council has been implementing the zero-carbon standard through the creation of a Carbon Offset Fund. The Council prefers that the zero-carbon requirement is met on site and carbon offset is the last resort. However, where it cannot, the Council has a carbon offset fund.</p> <p>The Council have developed a list of diverse potential projects which are aligned with the Council's priorities and values, climate emergency declaration and carbon neutral targets and action plan and projects which would achieve carbon savings. The Council is using the GLA's Guidance for London's Local Planning Authorities on establishing and funding carbon offset funds. The key criteria identified to determine which projects will be funded is: 'carbon reduction and lifetime carbon cost effectiveness, additionally and community/co-benefits'.</p>

Respondent Name	Comments	Council's Response
	<p>changes to the BREEAM methodology expected in 2021 and that it may be necessary to update the document with reference to these changes to ensure that the intended policy outcomes can still be achieved. Further consultation on updates to the SPD should be undertaken at this stage.</p> <p>Similarly, the energy efficiency reduction measures for residential (10%) and non-residential (15%) are expected to change after the Part-L methodology and carbon factors are updated. ECDC recommends that the text is revised to acknowledge this change.</p> <p>With regards to unregulated demands, ECDC does not support the setting of limits in planning policy as there is currently no suitable method for estimating demands that can provide realistic ranges or comparable information. Beyond policy, 'real-world' estimates of energy in use can factor unregulated sources and provide range estimates when setting carbon budgets.</p>	<p>Projects focused on public buildings where residents and the community have access (e.g. libraries, social housing, community centres, schools etc.) are also considered a priority. Flexibility is recommended to allow for a range of projects to be supported. Programmes/initiatives which have wide-ranging benefits for the fuel poor will not be discounted.</p> <p>Please see the Council's Environment Select Committee report for more information: https://www.rbkc.gov.uk/council-councillors-and-democracy/open-data-and-transparency/environment-select-committee</p> <p>The Council will identify the projects that will be funded. However, the SPD is not deviating from the London Plan per tonne figure.</p> <p>We will add reference to the Future Buildings Standard, Part L of the Building Regulations on pg. 25 of the SPD. We will also ensure relevant policy in the New Local Plan reflects these updated standards.</p>
Rick Britt	I note Octavia Housing's Passivhaus award, not only the first in RBKC, but in the whole country. They are a Housing Trust; perhaps their expertise could be harnessed?	Comment noted.

Respondent Name	Comments	Council's Response
Environment Agency (Lisa Mills)	No comment within our remit	Noted.
DP9 (Dan Fyall)	<p>For the avoidance of doubt, Q7 is answered on the basis that such standards remain voluntary, and 'should be encouraged' does not imply that the Council should set these voluntary industry standards as local policy requirements.</p> <p>References throughout to reductions 'beyond Building Regulations Part L' should be clearer this target is with reference to the current Building Regulations 2013, as per NLP paragraph 9.2.5 and footnote 154.</p> <p>St William supports measures to reduce energy demand. The net zero carbon target and requirement for applicants of major development to submit a detailed Energy Strategy is in accordance with relevant NLP policies/guidance and the principles set out in Section 5 are supported.</p>	<p>Support noted.</p> <p>We will amend the reference to Building Regulations 2013 on pg. 25, as per NLP para. 9.2.5 and footnote 154.</p>
RBKC (Charles O'Connor)	Concerned about suggestions of mechanical ventilation. Residents do not want fans and air con units everywhere and the other damage to the environment caused by the production of these devices needs very careful consideration. I think the Council will be discouraging aircon units but it is not entirely clear.	<p>Comment noted.</p> <p>Page 32 of the Draft SPD sets out a hierarchy for reducing internal overheating and air conditioning system in accordance with a cooling hierarchy. The use of mechanical ventilation and active cooling is at the</p>

Respondent Name	Comments	Council's Response
		very end of the hierarchy once all the other measures have been considered properly.
Cornwall Mews South (West Side) RA (Philippa Jill Manasseh)	Voluntary does not mean unassisted or unsupervised .	Noted.
Ms Sarkis	<p>Is there an expert at the council who can advise on retrofit passivhouse standards?</p> <p>Passivehouse standards should be mandatory on all new development.</p> <p>No reason not to, the developers' retail price per sq foot means a profit margin that can easily accommodate it to mitigate the environmental issues caused and the loss amenity usually arising to residents.</p>	<p>Comments noted.</p> <p>The Council is always willing to advise on retrofit standards and we have provided detailed guidance in section 9 of the SPD. However, applicants and householders should seek expert advice when considering implementing the voluntary standards, as each development will be unique depending on the property type and context of the site.</p> <p>We do not have the evidence to support that Passivhaus will be possible in all scales of development.</p>
St Helen's Residents Group (Jenny Harborne)	Regarding how to 'green' homes new and existing, this is a complex issue with many levels of building physics involved, and I do not think that Borough planners are best placed to assess this, it is true that many aspects affect the appearance of buildings, which is in the planners' remit, but for the planners, at planning stage, to determine or judge the method of	<p>Comments noted.</p> <p>Planners will get expert input from Climate Change colleagues in assessing the energy assessments submitted by applicants. This will not override building regulations but work alongside it. The Government consulted on an idea to remove the powers to set standards in local planning policies. However, following</p>

Respondent Name	Comments	Council's Response
	<p>achieving improvements or zero rating of developments cannot be the right way round.</p> <p>I therefore think that if RBKC want to support a 35% improvement of energy and carbon saving on the current regulations then that can be stated, but the method of doing that needs to be left up to the designers and the assessment of that needs to be done at Building Control stage. If RBKC want to alter the Building Regs, how do they propose the Building Control assessment and certification is done? They cannot lawfully override it.</p>	<p>consultation the Government has concluded that planning authorities can set such standards.</p>
<p>Cadogan Estates Limited (Jane Henshaw)</p>	<p>As a responsible developer we aim to use these standards where possible. However, the nature of the built environment of the estate is such that great care needs to be taken in considering which standard to adopt.</p> <p>In our Passivhaus development, a mews house, we were able to adopt the Passivhaus approach because the project required very heavy intervention, including much demolition and reconstruction. There are other similar properties that we have refurbished, however, because we have not needed to carry out such extensive works, only the principles of the Passivhaus standard could be incorporated (such as air tightness) as a point of good practice, rather than full adoption of the complete standards. Therefore a voluntary approach to third party certification is encouraged.</p>	<p>Support for voluntary standards and comment noted.</p> <p>Section 9 of the SPD provides detailed guidance on retrofitting existing buildings, including listed buildings and properties located in conservation areas. It is made clear in this section that we seek the right balance between meeting energy demand standards and protecting the local architecture.</p> <p>Each proposal will continue to be considered on an individual basis, which allows flexibility to be built into the process. As stated in section 5 and 9, we understand that not all sites or proposals will be able to meet the highest standard, especially in the case of listed buildings and properties located in conservation areas. The objective is to ensure energy demand has</p>

Respondent Name	Comments	Council's Response
	<p>We find the BREEAM standards can sometimes be quite restrictive. On occasion, we have found the difference between achieving a Very Good or Excellent rating depends on relatively banal criteria, such as cycle stands. Nevertheless, industry wide standards are important to set benchmarks. We do however encourage review of the standards recommended and do where possible contribute to the debate about improvements of the various standards, such as BREEAM or Passivhaus.</p> <ul style="list-style-type: none"> • We would like the document to acknowledge the difficulties a 'fabric first' approach will be for proposals relating to heritage assets. We would like to see a balance between energy demands and the retention and conservation of local architecture, as this is what makes the borough so unique. • Further thought should be given to the carbon offset calculation and long-term carbon reduction aspiration. For example, it is not clear whether the 30-year calculation takes into consideration the decarbonisation of the grid and decreasing electricity carbon factor. If it does not, the 30-year multiplication of the first year of emissions might be a gross overestimation of actual emissions over 30-years. • Offset costs, which are coming across as a further tax on development, will be prohibitive in already 	<p>been considered as far as possible in every development proposal.</p> <p>The SPD guidance in relation to carbon reduction targets and carbon offsetting have been produced in conformance with policy requirements set by the New London Plan, which we are required to do by current planning legislation.</p> <p>Fabric first – Section 9 provides for this. See table on page 53 and mpre widely section 9 in relation to retrofitting in our heritage setting.</p> <p>The Council has a target to be carbon neutral in its own operations and a carbon neutral Borough by 2040. Therefore, we prefer offsetting to be done within the Borough. However, the SPD is flexible in that carbon can be offset off-site or as a payment.</p> <p>To accord with the requirements of the London Plan, from the 1st April 2017, the Council has been implementing the zero-carbon standard through the creation of a Carbon Offset Fund. The Council prefers that the zero-carbon requirement is met on site and carbon offset is the last resort. However, where it cannot, the Council has a carbon offset fund.</p> <p>The Council have developed a list of diverse potential projects which are aligned with the Council's priorities and values, climate emergency declaration and carbon neutral targets and action plan and projects which</p>

Respondent Name	Comments	Council's Response
	<p>challenged projects.</p> <ul style="list-style-type: none"> In relation to the carbon offset fund, it is suggested that RBKC are transparent with how this will be spent and provide a list of initiatives or projects where the fund collected will be spent, on verified, audited offsets. This should include annual updates. 	<p>would achieve carbon savings. The Council is using the GLA's Guidance for London's Local Planning Authorities on establishing and funding carbon offset funds. The key criteria identified to determine which projects will be funded is: 'carbon reduction and lifetime carbon cost effectiveness, additionally and community/co-benefits'.</p> <p>Projects focused on public buildings where residents and the community have access (e.g. libraries, social housing, community centres, schools etc.) are also considered a priority. Flexibility is recommended to allow for a range of projects to be supported. Programmes/initiatives which have wide-ranging benefits for the fuel poor will not be discounted.</p> <p>Please see the Council's Environment Select Committee report for more information: https://www.rbkc.gov.uk/council-councillors-and-democracy/open-data-and-transparency/environment-select-committee</p> <p>The Council will identify the projects that will be funded. However, the SPD is not deviating from the London Plan per tonne figure.</p>
Earl's Court Area Action Group (Bella Hardwick)	There are criticisms of all three voluntary industry standards and it would be useful to know how the Council has evaluated these and worked out any mitigations.	<p>Comments noted.</p> <p>The voluntary standards are well established and whilst we do not require development to meet these voluntary</p>

Respondent Name	Comments	Council's Response
	<p>Fuel poverty is a very serious problem so how will the Council's Greening SPD work with its Housing Sustainability and Fuel Poverty Strategy? (https://www.fuelpovertyaction.org.uk/)</p>	<p>standards, they are considered to be aligned with the aim of reducing carbon emissions.</p> <p>The Greening SPD is largely about raising and requiring high standards from new buildings as this is where planning policies can have the most impact. As stated, the first step in the energy hierarchy is to "Be Lean" this means designing buildings to be thermally efficient – cool in summer and warm in the winter. While this approach reduces carbon emissions, it also helps reduce energy bills and therefore contributes to alleviating fuel poverty.</p> <p>Households living in homes with low energy-efficiency ratings are more likely to be in fuel poverty, and to live in cold, damp, uncomfortable conditions that deepen health inequalities. This is more likely to affect the most vulnerable households that often live in less affluent areas. The Council's Housing Sustainability and Fuel Poverty SPD outlines our commitment to addressing fuel poverty by improving heating and energy efficiency in our housing stock. The objectives of the Greening SPD are therefore very much aligned with the Council's approach to addressing fuel poverty in the Borough.</p>
<p>CAMELLIA Research Project Imperial College London (Ana</p>	<p>Approved certifications/standards are quite relevant and ensure a common language in terms of metrics and evaluation criteria. You should consider to add the BREEAM standard, which is the most extended in the UK.</p>	<p>Suggestions noted.</p> <p>We have included requirements for meeting the BREEAM standard in section 5 of the SPD.</p>

Respondent Name	Comments	Council's Response
Mijic Pepe Puchol-Salort)	<p>Going forward, it would be also advisable to consider water management standards as well, for example the Property Resilience Certificate (PRC) proposed by the Policy Connect report (Allen, R., et al. (2020). Bricks and Water. Building Resilience of England's Homes. Policy Connect. Westminster Sustainable Business Forum. Retrieved from: https://www.policyconnect.org.uk/research/bricks-water-building-resilience-englands-homes). PRC aims to drive improvements in water efficiency, to increase and measure the use of sustainable drainage (SuDS) and to uptake of property-level flood resilience</p> <p>Finally, we are a bit worried about the "voluntary" standards and if developers will be actually aiming to follow them. Are you thinking about any type of incentive?</p>	<p>The Council is currently in the process of a New Local Plan Review with the aim to adopt a New Local Plan in 2023. A key element of the work on the new plan will be to transfer the guidance outlined in this SPD into policy. This will be an opportunity to review the impact of the SPD and improve upon it where needed.</p> <p>We will explore adding requirements for water efficiency in line with BREEAM and other standards as suggested in policy formulation for the New Local Plan.</p> <p>Section 12 of the SPD contains detailed guidance on minimising flood risk, including support for the use of SuDS.</p> <p>We do not have evidence to support setting requirements for the standards recommended in the Policy Connect report. Similarly, we do not have evidence to support that Passivhaus and the other energy performance standards will be possible in all scales of development and therefore we are not setting these as requirements.</p>
Diocese of London (Sue Lewin)	<p>Page 27. How will the Council spend its offsetting fund? This is not a tax, nor money to be deposited or invested at interest. It should be applied to projects that have been accredited after due diligence to draw down GHGs from the atmosphere, and only for that. The amount of GHGs offset in this way should be</p>	<p>To accord with the requirements of the London Plan, from the 1st April 2017, the Council has been implementing the zero-carbon standard through the creation of a Carbon Offset Fund. The Council prefers that the zero-carbon requirement is met on site and</p>

Respondent Name	Comments	Council's Response
	<p>continuously monitored to ensure that it is at least equal to the quantity paid for by developers</p>	<p>carbon offset is the last resort. However, where it cannot, the Council has a carbon offset fund.</p> <p>The Council have developed a list of diverse potential projects which are aligned with the Council's priorities and values, climate emergency declaration and carbon neutral targets and action plan and projects which would achieve carbon savings. The Council is using the GLA's Guidance for London's Local Planning Authorities on establishing and funding carbon offset funds. The key criteria identified to determine which projects will be funded is: 'carbon reduction and lifetime carbon cost effectiveness, additionally and community/co-benefits'.</p> <p>Projects focused on public buildings where residents and the community have access (e.g. libraries, social housing, community centres, schools etc.) are also considered a priority. Flexibility is recommended to allow for a range of projects to be supported. Programmes/initiatives which have wide-ranging benefits for the fuel poor will not be discounted.</p> <p>Please see the Council's Environment Select Committee report for more information: https://www.rbkc.gov.uk/council-councillors-and-democracy/open-data-and-transparency/environment-select-committee</p>

Section 6: Heat Networks (be clean)

Q9: Do you have any comments on section 6?

Respondent Name	Comments	Council's Response
Ladbroke Association (Sophia Lambert)	No	Noted.
London Wildlife Trust (Mathew Frith)	We support the requirements set out.	Support noted.
Canal & River Trust London (Claire McLean)	Page 117 Heating and Cooling The canal water can be used for heating and cooling of adjacent developments, and is generally more sustainable than other methods. Many waterside developments have made use of this, notably GSK in Brentford and several sites in London Docklands	The Council is aware that the canal can be a good source of extracting heat. This is something that we will need to consider for the Kensal Canalside Opportunity Area as this is a scheme of a scale capable of supporting this.
Michael Stock (Michael Stock)	Good.	Support noted.
Gaunt	No	Noted.
Luisa Cicognani	I do not think this is feasible in conservation areas.	Comment noted. As set out in section 6 the larger scale applications have more onerous requirements such as opportunity area sites looking at energy masterplans. These are outside of conservation areas. Major developments are identified as suitable for low temperature communal

Respondent Name	Comments	Council's Response
		heating. This will be possible in conservation areas. We recognise that in certain circumstances a site by site approach will be required.
Sabine Laurent Varoutsi	none	Noted.
G Thomson	<p>ECDC supports the principle of heat networks where suitable but have some specific concerns with their implementation as noted below.</p> <p>1) Extending a heat network to connect with ultra-low heating demand buildings (such as Passivhaus buildings) may not be feasible and viable given the low loads required and as consequence it could discourage the adoption of such fabric standards. Instead, ultra-low heating demand buildings should be allowed to explore other options for space heating such as direct electric rather than use heat pumps / similar technology.</p> <p>2) Discouraging the excessive use of active cooling is welcomed. However, recognising that where active cooling is necessary this can facilitate the potential to capture waste heat from cooling that could be used for hot water or other functions. This can be a very effective method, which should be recognised in the SPD.</p> <p>3) The effectiveness of an energy network relies upon a suitable density and balanced mix of residential and commercial uses. Distribution losses associated with transmission across an energy</p>	<ol style="list-style-type: none"> 1) Comments noted. We are not expecting Passivhaus standards as a requirement, this is a voluntary standard. Communal low temperature heating systems are recommended in our evidence for the SPD. 2) Active cooling is the last resort in the cooling hierarchy and para 5.33 of the Draft SPD reflects the comments regarding heat capture as described. 3) Noted. Site such as Earl's Court will need an energy masterplan as stated and the issues raised considered. The two opportunity area sites are the key opportunities to develop new district heating but clearly this would require detailed work bespoke to the site to find the best sustainable solution. 4) The SPD does not need to recognise the challenges stated as these can be tackled through an energy masterplanning approach for site such as Earl's Court. The SPD recognises that technology can progress rapidly, and the

Respondent Name	Comments	Council's Response
	<p>network can be detrimental to its energy and carbon efficiency as well as its commercial viability. Furthermore, the implications of local energy boosting plant potentially required to compensate for losses is a factor requiring consideration.</p> <p>A sub-optimal mix of uses reduces the opportunity for energy sharing and consequently the embodied carbon associated with establishing the network may be counter-productive and may be a worse outcome (in carbon terms) than building-level solutions that don't require the same level of infrastructure. The embodied carbon of energy networks compared to their operational benefits are uncertain and therefore the SPD should recognise that site specific strategies for large opportunity sites (such as Earls Court) should be developed based on the mix of uses within the masterplan. Flexibility is required to ensure that the best outcome can be achieved.</p> <p>4) Establishing billing structures for networks delivering both heating and cooling can be challenging as they should incentivise an appropriate balance of heat rejection and extraction at different times of the year. This challenge should also be recognised in the SPD.</p>	<p>issues stated may be tackled on a site by site basis.</p>
Rick Britt	<p>I would be wary of communal heating schemes in how they are charged to the occupants of the properties receiving heating. Metering, price how</p>	<p>Comments noted.</p> <p>Low temperature communal heat distribution systems are recommended in our evidence as it will not be</p>

Respondent Name	Comments	Council's Response
	set? Via a service charge, also how set and controlled?	possible for most sites to deliver larger scale district heating.
KRACR (Chris Lenon)	The requirements in this section need to achieve their objectives at a cost comparable with other heating sources over the same period of use to avoid undue costs to social housing tenants.	Comments noted. Using the energy hierarchy (not just looking at each element in isolation) will reduce costs of energy.
Environment Agency (Lisa Mills)	No comment within our remit	Noted.
DP9 (Dan Fyall)	The guidance on heat networks within Section 6 and the associated requirements set out within NLP Policy SI3 are noted. However, we request that it is acknowledged in paragraph 6.5 that it may not necessarily be possible/appropriate to establish a masterplan heat network/district heating for the Kensal Canalside Opportunity Area due to practical implementation considerations, namely multiple landowners with separate phasing strategies.	Noted. Section 6 recognises that energy masterplans should be developed for large scale sites, such as Kensal Canalside, in line with the provisions of the New London Plan. We would expect that Kensal, which is an opportunity area site will provide a site-wide solution with landowners working together rather than looking solely at land parcels they own. The SPD does not need to recognise the challenges stated.
RBKC (Charles O'Connor)	Heat networks are to be encouraged	Support noted.
Cornwall Mews South (West Side) RA	This is a great idea. Is it possible to use waste to do this.	Support noted. Yes, waste can be used and para. 6.5 covers this.

Respondent Name	Comments	Council's Response
(Philippa Jill Manasseh)		
South Kensington Estates (Tim Butler)	We support heat networks where possible	Support noted.
Ms Sarkis	<p>Communal heating can be problematic when it goes wrong, and pricey to individual leaseholders.</p> <p>My priority would be to ensure passivehouse standards of insulation for all major developments applied for within a year. It is radical but will meet targets and it would be visionary. We need this kind of environmentally positive and morally aspirational aim not just for the environment but to regain confidence in our housing affairs after our notoriety and the shame of Grenfell.</p>	<p>Comments noted.</p> <p>Section 5 of the SPD outlines our support for Passivhaus and other voluntary energy performance standards. Modern systems are cost effective and are needed in major developments.</p>
	Encourage local communities to contribute to and maintain a communal ground source heat pump where possible.	Noted.
Cadogan Estates Limited (Jane Henshaw)	<ul style="list-style-type: none"> Flexibility is needed in the approach to communal and de-centralised heating systems. Communal heat networks are not necessarily the most efficient heating method where properties are not permanently occupied. For example, given the number of part-time occupants in the borough, de-centralised heating systems in larger blocks may be 	<p>Comments noted.</p> <p>As stated in section 6, the Borough currently has no decentralised heat networks and therefore opportunities to deliver low temperature communal heat distribution systems must be considered. However, the Council is aware that not all development and buildings are suited to accommodate heat networks. Each proposal must be</p>

Respondent Name	Comments	Council's Response
	<p>more effective.</p> <ul style="list-style-type: none"> • Within areas and groups of buildings, the ownership and affordability of connecting to any area heat network needs to be transparent. It is suggested that developments should be 'connection ready' to allow for flexibility in the future. 	<p>considered carefully to ensure it provides the best outcome for our residents.</p>
Earl's Court Area Action Group (Bella Hardwick)	No	Noted.
CAMELLIA Research Project Imperial College London (Ana Mijic Pepe Puchol-Salort)	It seems a good proposal, simply bear in mind possible heat losses for communal heat networks.	Comment noted.
Diocese of London (Sue Lewin)	Page 33. Local hydrogen fuel cell CHP should be supported where viable.	<p>Suggestion noted.</p> <p>The SPD recognises that technology can progress rapidly, and the issues stated may be tackled on a site by site basis.</p>

Section 7: Renewable Energy (be green)

Q10: Do you have any comments on section 7?

Respondent Name	Comments	Council's Response
Jane Whewell	<p>We consider that throughout the document insufficient attention has been paid to the risk of uncontrolled 'green' developments causing significant detriment and harm to neighbours and to the historic environment.</p> <p>It is well-known that solar panels can cause significant noise pollution (eg inverters) and sometimes vibration harms. Ground source and air source heat pumps also generate significant noise (some can be extremely noisy - even noisier than air-conditioning) and wind turbines cause significant noise, vibration and flash/flicker light pollution. For this reason, we consider it would be completely inappropriate for such installations not to require planning permission to ensure that very harmful impacts on neighbours and the conservation areas can be minimised and controlled.</p> <p>It is particularly important that noise impacts are addressed upfront and before construction. When air-conditioning is approved, conditions are placed on such equipment requiring that if noise from the equipment is above a certain sound level, the equipment must be switched off. This is extremely helpful and it is perfectly possible for air-conditioning</p>	<p>Comments noted.</p> <p>The SPD is focused on environmental issues, but other policies related to character and appearance of conservation areas and listed buildings will continue to apply. We have a statutory duty both for conservation areas and listed building, the SPD does not override that but will work in tandem. This is also established in relevant sections of the SPD (section 9 and 11 for example).</p> <p>The Council is aware of the concern about noise and the visual impact of implementation of green technologies such as solar PV, wind turbines and heat pumps.</p> <p>Solar PV is permitted development in some circumstances. Where planning permission is required the Council can place conditions to mitigate any harmful impacts. This is also the case for both ground and air source heat pumps. The table on pg. 58-60 of section 9 of the SPD provides more detail on when planning permission is and is not required for solar PV, wind turbines and heat pumps. In addition, we have set out the requirement for a noise and vibration assessment</p>

Respondent Name	Comments	Council's Response
	<p>to be switched off. However in the case of equipment that provides power and heating it is far more difficult for it to be switched off as its removal can affect relevant residents' health and well-being. As a result it is significantly more important that such equipment is built right and controlled first time and that noise vibration and other related harms are addressed upfront and not after the fact when neighbours are suffering significant harm.</p> <p>Equally, when solar panels are placed in gardens/at ground level or on roofs adjacent to other homes, and where those other homes have roofs at different levels and/or overlook such solar panels, this can result in blinding glare reflected into domestic homes and gardens and cause significant damage to private views of multiple homes within a conservation area. This can also harm the environment and appearance of listed buildings.</p> <p>The combination of noise harm, the risk of solar glare and harm to conservation areas within the Borough means we strongly oppose the suggestion that solar panels on roofs and in gardens and the installation of air and ground source heat pumps and wind turbines should not require planning permission. To allow such development without full consultation on the impacts on neighbours would cause significant harm. Similarly it is essential that noise pollution is</p>	<p>where air source heat pumps are proposed in section 7 of the SPD.</p> <p>We will change this text on pg. 39 to state when planning permissions is needed, we will require a noise and vibration assessment.</p> <p>Once adopted, the SPD will be a material consideration in determining planning applications, and it will work alongside other policies in the Local Plan. We need to acknowledge that the Government is now committed to phasing out gas boilers. From current technologies available the feasible options to householders will be heat pumps and therefore they need to be included in the SPD. Their impacts will need to be mitigated but it is also possible that other technologies emerge or improve as gas boilers are phased out.</p>

Respondent Name	Comments	Council's Response
	<p>controlled and that impacts impacts on historic fabric and conservation areas are properly considered before such equipment is installed.</p> <p>Overall we consider the potential harm of such equipment to the historic fabric of the Borough has been significantly underestimated in this document. This is a densely built Borough with homes of different height levels and installation on roofs is far from out of sight and as a result will cause significant harm to residents and conservation areas.</p> <p>(We would add that ground and in particular air source heat pumps are ineffective at heating homes unless combined with significant additional insulation and new radiators and this fact should be taken into account in this document).</p>	
Ladbroke Association (Sophia Lambert)	<p>AIR SOURCE HEAT PUMPS. We welcome the recommendation that all applicants should submit a noise and vibration assessment when an air source heat pump is proposed to be used, as noise is one of the chief neighbour problems from them.</p> <p>We think that the document needs to acknowledge the fact that in the present state of technology, it is not usually practical to replace gas boilers in existing buildings with heat pumps. In the longer term we hope that hydrogen will prove a greener alternative fuel to gas.</p>	<p>Comments noted.</p> <p>Section 7 only refers to requirements for new build. Section 9 of the SPD considers retrofit of existing buildings and includes guidance on renewables.</p> <p>Regarding solar PV on all new buildings, as stated in section 5 of the SPD, we require applicants to submit an energy assessment, which must demonstrate how carbon reduction has been considered and followed the energy hierarchy including the implementation of renewable energy sources. We cannot have a blanket requirement for all new development to have solar PV,</p>

Respondent Name	Comments	Council's Response
	<p>SOLAR PV: Butterfly roofs are a fairly common feature in Victorian terrace buildings in our conservation areas, in most cases hidden from view behind parapets. It would be worth making the point, either here or in Chapter 9, that this sort of roof on historic buildings is well suited for solar PV on the side more nearly facing the sun where it is hidden from view behind a parapet. An explanation of the possibility of selling surplus energy to the grid might be useful.</p> <p>We would also like to see all new build required to have solar PV unless it can be demonstrated that it is not viable or feasible or unsuitable for some reason. New build houses and flats with flat roofs and a parapet could hide PV panels. But, until PV panels can simulate a natural slate roof, adding PV panels to a visible pitched roof should be avoided in conservation areas.</p>	<p>as it may not be the most appropriate source of renewable energy for every site. The provisions of the SPD seek to ensure the development proposals give due consideration to renewable energy sources so that the most optimum solutions are delivered.</p> <p>We will add to the text in para. 9.41 making explicit reference to butterfly roofs.</p>
London Wildlife Trust (Mathew Frith)	We support the requirements set out.	Support noted.
Michael Stock (Michael Stock)	Good,	Support noted.
Greg Hammond	I support the encouragement for fitting renewable energy sources (ie micro-generation).	Support noted.

Respondent Name	Comments	Council's Response
Ewen Angus Cameron	<p>Please excuse me if I don't read the entire consultation in detail but I would like to cite one example of the impact of planning policy.</p> <p>I live in a 4 storey house, 2 of these at street level or above plus a mansard extension on top. This provides me with a flat roof on which I wished to fit a solar panel. For optimum performance the panel needs to be angled south which would raise one side about 18 inches above the roof. Planning regulations prevented me from doing so because my house is in a conservation area.</p> <p>The roof is about 35 ft above street level and the solar panel would be visible only to low flying aircraft. Planning policy needs to presume an inherent advantage in such structures in the 21st century. I have no doubt that at some point double glazing would have been considered beyond the pail. Time to move on.</p>	<p>Comments noted.</p> <p>This Council supports the use of solar panels where appropriate and has provided advice for householders and applicants on the use of solar panels in sections 7 and 9 of the SPD. However, as explained in section 9, in the case of listed buildings or properties located within conservation areas. These must be dealt with on a case by case basis to determine how the installation of solar panels may impact the special heritage interests of the property itself or the character of wider conservation area.</p>
Milner Street Area Residents' Association (Richard Grantley)	<p>12. We favour the encouragement of renewable energy sources. However, additional "green" infrastructure should not come at the expense of other types of pollution, e.g. visual pollution or noise pollution.</p> <p>13. Solar panels should generally be positioned out of view, both from the street, and from neighbouring properties.</p>	<p>Comments noted.</p> <p>12. The SPD does address noise mitigation (see pg. 38-39).</p> <p>13. Section 9 does provide such guidance.</p> <p>14. Wind turbines are stated as unsuitable in the Borough (see para. 7.17).</p>

Respondent Name	Comments	Council's Response
	<p>14. Wind turbines should not be encouraged for the same reasons, particularly as the potential for incorporating wind turbines in urban environments is limited due to low average wind speeds and turbulence caused by neighbouring buildings.</p> <p>15. Air heat pumps should only be encouraged where there is a major benefit, and under strict noise conditions. If the use of air heat pumps became widespread over the Borough, the cumulative effect could create a significant noise problem for the Borough. (This can already be a problem with air conditioning units, but fortunately their use in residential parts of the Borough is the exception rather than the rule.) The SPD on Noise (2009) would need to be toughened to ensure that permitted sound levels are set more strictly, so that air heat pumps would not be audible at all from neighbouring properties. This would most likely mean reducing further the minimum recommended noise levels (currently 10dBA below background noise level), and making sure that this figure is strictly enforced.</p>	<p>15. Both ground and air source heat pumps are permitted development in some circumstances. The table on pg. 59-60 of section 9 of the SPD provides more detail on when planning permission. Where planning permission is required the Council can place conditions to mitigate any harmful impacts. As such, we have set out the requirement for a noise and vibration assessment where air source heat pumps are proposed in section 7 of the SPD.</p> <p>We will change this text on pg. 39 to state when planning permissions is needed, we will require a noise and vibration assessment.</p> <p>We need to acknowledge that the Government is now committed to phasing out gas boilers. From current technologies available the feasible options to householders will be heat pumps and therefore they need to be included in the SPD. Their impacts will need to be mitigated but it is also possible that other technologies emerge or improve as gas boilers are phased out.</p>
Gaunt	No	Noted.
Luisa Cicognani	Not feasible in historical conservation areas	Noted. Measures feasible in conservation areas are set out in Section 9. Major developments do happen in

Respondent Name	Comments	Council's Response
		conservation areas and it will be possible to include renewables in such development.
Sabine Laurent Varoutsi	For the single dwellings typically seen in the borough, the roof area is too small for solar pannels to be a credible alternative source of energy. You should advise owner of single dwellings to add solar thermal systems instead.	Noted. Section 7 of the SPD includes guidance on solar thermal systems.
G Thomson	ECDC agrees with the requirement for development of all scales to consider the opportunity for on site renewable energy sources. In support of this ambition, ECDC suggests that guidance is provided on the use of battery storage as it is not currently recognised in the Part-L methodology (used for establishing CO2 emissions for planning applications).	Support and suggestions noted. We aware the Greening SPD deals with many new and emerging technologies/approaches. We will be monitoring their implementation and impacts and will adapt policy to address any future issues and technological advances. The SPD is not intended to be an exhaustive list of all interventions and technologies that we will support and therefore does not provide guidance on all possible renewable technologies. It is establishing principles that we will require planning application to follow. In the case of section 7 this is the use of on-site renewable energy sources where possible. It will be for individual proposals to determine what the most appropriate technologies are, depending on the context and specific of the site.
Historic England (Katie Parsons)	Energy Efficiency and Historic Buildings: How to Improve Energy Efficiency	Suggested guidance noted.

Respondent Name	Comments	Council's Response
	<p>https://historicengland.org.uk/images-books/publications/eehb-how-to-improve-energy-efficiency/</p> <p>Energy Efficiency and Historic Buildings - Application of Part L of the Building Regulations to historic and traditionally constructed buildings https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/</p> <p>Energy Efficiency and Historic Buildings: Energy Performance Certificates https://historicengland.org.uk/images-books/publications/eehb-energy-performance-certificates/</p> <p>Energy efficiency and traditional homes, Historic England Advice Note 14 https://historicengland.org.uk/images-books/publications/energy-efficiency-and-traditional-homes-advice-note-14/</p> <p>A full list of all out technical guidance on energy efficiency can be found in our publication directory: https://historicengland.org.uk/content/docs/advice/technical-conservation-guidance-and-research-brochure-pdf/</p>	<p>Section 9 of the SPD provides in depth guidance on retrofit of existing buildings, including listed buildings and properties located in conservation areas. The guidance refers to relevant and up to date guidance throughout.</p>

Respondent Name	Comments	Council's Response
KRACR (Chris Lenon)	No comment	Noted.
Environment Agency (Lisa Mills)	No comment within our remit	Noted.
Richard Crane	Where possible use of renewable energy should be encouraged or indeed made mandatory.	Support noted.
Fernando Lobo	Not enough is being done. There should be large-scale promotion of self-replenishing energy technologies. Hydro and or solar power should be extended to small scale businesses and homeowners.	Comment noted. Hydro may not be possible in the Borough but business and homeowners or any landowner/developer are being encouraged to use solar/renewables.
DP9 (Dan Fyall)	The guidance on renewable energy within Section 7 and associated Local Plan and NLP policies are noted, however we request that the commentary under heading 'What do I need to consider?' for Solar PV (7.9 - page 39) and Solar Thermal (7.12 – page 41) both note that in some developments whether the inclusion of solar renewable technologies is appropriate (and their extent) may be dependent on other competing planning requirements such as the provision of upper/roof level amenity space and play space.	Comments noted. The SPD does not need to caveat the uses and other policies will apply in the usual way and planning balance considered in each case as required.
RBKC (Charles O'Connor)	Solar/PV is not suitable	Noted.

Respondent Name	Comments	Council's Response
Cornwall Mews South (West Side) RA (Philippa Jill Manasseh)	Energy must be renewable everyone knows this but as above help is needed	Support noted.
South Kensington Estates (Tim Butler)	We support renewable energy, including provision for renewable energy on existing buildings in conservation areas	Support noted. Section 9 of the SPD provides detailed guidance for existing buildings, including those located in Conservation Areas.
Ms Sarkis	Seems fine	Support noted.
Kensington Society (Sophia Lambert)	Section 7: renewable energy (be green) With 70% of the borough in conservation areas, we question the emphasis on renewable energy, such as photo-voltaic solar panels or even heat pumps. For heat pumps there is the cost consideration of installing a typical system costs around £9,000 – £11,000 and the noise from the system is also known to be a problem. We should emphasis the reduction of energy not just other ways to provide energy. There are opportunities to improve household energy performance but it requires a careful balance between design, conservation and energy saving. There needs to be more detailed guidance on issues such as insulation, windows and heating appliances. Heat pumps are not yet feasible for any but the larger households, so for probably the next five to ten years	Noted. Section 7 of the SPD is aimed at new build where renewables will be possible. The energy hierarchy sets out that reducing energy demand is the highest priority, followed by clean energy provision and then renewable energy. Section 5 sets out our guidance on reducing energy demand in new development. We recognise that air source heat pumps are expensive but need to look at the future where the Government is aiming to phase out gas boilers, so these new systems need to be recognised and supported in the SPD. Section 9 of the SPD provides detailed guidance for householders on interventions for improving the energy

Respondent Name	Comments	Council's Response
	<p>gas boilers will inevitably have to be replaced. Emphasis needs to be placed on other measures that householders can take in the meantime to reduce their energy consumption.</p>	<p>performance of existing buildings including insulation and windows etc.</p>
<p>Cadogan Estates Limited (Jane Henshaw)</p>	<ul style="list-style-type: none"> • There is a challenge in RBKC with balancing the requirement for PVs with the historic urban form of the roofscape. There is limited available space, and often the pitched roofs are not suitable for PV panels. • We consider that RBKC may achieve an improved approach by allowing for cost and carbon-efficient offsite UK renewable generation (perhaps from solar farms or offshore wind) and accompanying power purchase agreements (PPAs). • This approach may in some instances allow for considerably more renewable generation per pound of investment, rather than onsite solutions, and does still count towards operational net zero. 	<p>Suggestions noted.</p> <ul style="list-style-type: none"> • This Council supports the use of solar panels where appropriate and has provided advice for householders and applicants on the use of solar panels in sections 7 and 9 of the SPD. However, as explained in section 9, in the case of listed buildings or properties located within conservation areas. These must be dealt with on a case by case basis to determine how the installation of solar panels may impact the special heritage interests of the property itself or the character of wider conservation area. • The carbon offsetting section of section 7 contains provisions for funding off-site interventions. To accord with the requirements of the London Plan, from the 1st April 2017, the Council has been implementing the zero-carbon standard through the creation of a Carbon Offset Fund. The Council prefers that the zero-carbon requirement is met on site and carbon offset is the last resort. However, where it cannot, the Council has a carbon offset fund. <p>The Council have developed a list of diverse potential projects which are aligned with the</p>

Respondent Name	Comments	Council's Response
		<p>Council's priorities and values, climate emergency declaration and carbon neutral targets and action plan and projects which would achieve carbon savings. The Council is using the GLA's Guidance for London's Local Planning Authorities on establishing and funding carbon offset funds. The key criteria identified to determine which projects will be funded is: 'carbon reduction and lifetime carbon cost effectiveness, additionally and community/co-benefits'.</p> <p>Projects focused on public buildings where residents and the community have access (e.g. libraries, social housing, community centres, schools etc.) are also considered a priority. Flexibility is recommended to allow for a range of projects to be supported. Programmes/initiatives which have wide-ranging benefits for the fuel poor will not be discounted.</p> <p>Please see the Council's Environment Select Committee report for more information: https://www.rbkc.gov.uk/council-councillors-and-democracy/open-data-and-transparency/environment-select-committee</p>
Earl's Court Area Action Group (Bella Hardwick)	We campaign for the world's greenest, multipurpose venue to be built on the Earls Court Masterplan. Residents were promised a significant replacement	Comments noted. The Council expects the Earl's Court site to be exemplary in terms of energy performance and

Respondent Name	Comments	Council's Response
	<p>for the demolished Earls Court Exhibition Centres by the Council on page 8 of the RBKC Local Plan 2015.</p> <p>The Birmingham NEC has built an anaerobic digestion plant where over 120 tonnes of its food waste is converted to energy to power local homes. The Earl's Court venue could do something similar.</p> <p>If local people set up projects to install solar panels on schools and other community buildings in the Earl's Court area in the next five years, then the proposed venue could build on this by having solar panels installed using the community share offer model and then go on to act as hub from which other local projects could spring.</p>	<p>sustainability standards and will support this as far as possible within our planning powers.</p>
<p>CAMELLIA Research Project Imperial College London (Ana Mijic Pepe Puchol-Salort)</p>	<p>This section complements very well the previous one. It would be advisable to highlight the difference (and perhaps divide it in two subsections) those renewable sources for heating (such as heat pumps or solar thermal) and the ones for energy production (solar PVs or wind).</p>	<p>Support noted.</p> <p>We will consider making the difference between heat and energy generating sources in section 7 clearer as suggested.</p>
<p>Diocese of London (Sue Lewin)</p>	<p>Pages 5, 36 & 37. The definition given of heat pumps is fundamentally unsound. Everything uses natural elements. The test is not that, but whether materials and energy are continually regenerated or replaced. Heat pumps are not renewable, except to the extent they are powered by renewable electricity (mention of which has not been found). Different types of ground</p>	<p>Comments noted.</p> <p>The definition of heat pumps used in the SPD are those used in the New London Plan and the SPD has been produced in conformance with the New London Plan, as required by current planning legislation.</p>

Respondent Name	Comments	Council's Response
	source heat pump should be distinguished, eg depending on whether they employ deep bores or shallow horizontal coils.	
Labour Group of Councillors (Mohammed Bakhtiar)	<p>All new major developments must have industrial air purifying systems considered when submitting a planning application. The council through its housing management team needs to explore the possibility of supplying its tenants with household air purifying units and arrange for their regular service as an on-spot remedy for the most polluted parts of the borough. Other housing providers need to be encouraged to follow the lead, while looking into other ways of cleansing the air on an industrial scale through carbon capture and carbon dioxide removal technology which have been used in over 50 countries around the world, and still expanding.</p> <p>The housing management department at the council and all other housing providers in the borough should consider installing solar panels on their buildings when and wherever possible and viable, especially on towers and high rising blocks. For instance; Block B at Trellick Tower is a potential site for a solar panel use.</p> <p>Any future council owned developments must consider, in line with Government Guidance, installing alternative methods instead of gas boilers, as at 50 Verity Close, in keeping with our commitment to build a circular sustainable economy to enable us to reach our Carbon Neutral Goals.</p>	<p>Noted.</p> <p>As part of the planning process Major Developments are required to submit an Air Quality Assessment which identifies if the development will introduce receptors into an area of poor air quality. If it is identified that receptors are to be exposed to poor air quality developers are required to provide suitable ventilation to filter out harmful pollutants to the internal development, which is secured by the Council through a planning condition. Within this condition it is stated that the ventilation plant is maintained properly, and filters changed on a regular basis.</p> <p>The Greening SPD sets out the principles to guide green development across the Borough. These requirements will apply to Council owned development in the same way as they would do to any other development.</p>

Section 8: Monitoring (be seen)

Q11: Do you have any other comments on section 8?

Respondent Name	Comments	Council's Response
London Wildlife Trust (Mathew Frith)	We support the requirements set out.	Support noted.
Michael Stock (Michael Stock)	Essential.	Support noted.
Gaunt	No	Noted.
Luisa Cicognani	no	Noted.
Sabine Laurent Varoutsi	none	Noted.
G Thomson	<p>ECDC accepts the need to report on the performance of completed buildings but as noted in Question 4 greater understanding as to the intent would be beneficial, particularly for large scale phased masterplan development.</p> <p>Regarding the specifics of appraisal, ECDC considers SAP to be a poor method for evaluating the unregulated energy consumption from dwellings. The use of this measure could lead to significant differences between the estimates at planning/as built stages and the in-use meter data.</p> <p>Streamlining reporting and data entry would be</p>	<p>Comments noted.</p> <p>The monitoring processes and requirements outlined in section 8 of the SPD are set by and will be fully managed and operated by the GLA. The methods of evaluating are also consistent with the GLA approach.</p>

Respondent Name	Comments	Council's Response
	welcomed and encouraged to facilitate and accelerate the process.	
KRACR (Chris Lenon)	No comment	Noted.
Environment Agency (Lisa Mills)	No comment within our remit	Noted.
Richard Crane	Any way of being measuring accountability are to be welcomed.	Noted.
DP9 (Dan Fyall)	No, this section is in accordance with NLP policies and guidance.	Noted.
Cornwall Mews South (West Side) RA (Philippa Jill Manasseh)	None other than to say to say it must have an efficient system	Noted.
V Rowlands	Will there be any other enforcement? Voluntary monitoring does not seem like it will incentivise change.	Section 8 of the SPD sets out that applicants will be required to report to the GLA against performance indicators and that we will ensure this is done through a legal agreement attached to the planning permission. This will make it a legal obligation. This monitoring process is set by and will be fully managed and operated by the GLA.
South Kensington	Monitoring is an important component in understanding the effectiveness of sustainable	Noted.

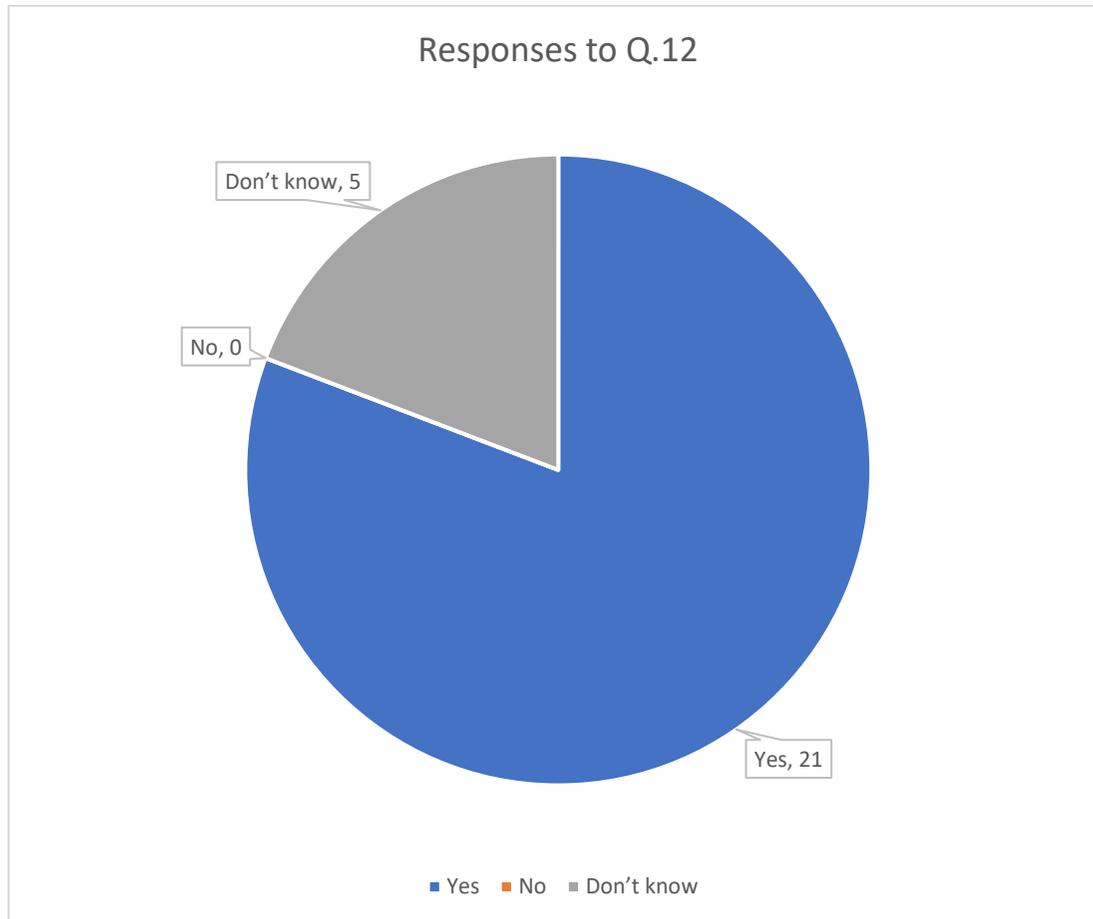
Respondent Name	Comments	Council's Response
Estates (Tim Butler)	measures to enable future policy to be directed effectively	
Ms Sarkis	No	Noted.
Kensington Society (Sophia Lambert)	Section 8: Monitoring: be seen Monitoring is a good idea but who is to pay for the staff for monitoring and how is enforcement to be handled? Running costs need to be factored in and where appropriate recovered from the developer.	Comments noted. The monitoring processes and requirements outlined in section 8 of the SPD are set by and will be fully managed and operated by the GLA. It is unlikely that we can enforce against under performance of a building but monitoring will help refine policies and close performance gap in due course.
St Helen's Residents Group (Jenny Harborne)	I do not think this is the remit of local planning, but of Building Control, it is too complex technically and involved in much other legislation. This will just cause a further layer of duplicated and conflicting standards and requirements.	Comment noted. The SPD can set standards locally which are assessed against minimum building regulation requirements.
Cadogan Estates Limited (Jane Henshaw)	<ul style="list-style-type: none"> • Smart data can be problematic in historic buildings due to connectivity issues, for example in basements and due to the thickness of building walls. • The ongoing reporting of actual performance to the GLA should be clarified in terms of timeframes. The proposed guidance suggests this reporting will be open-ended, but our preference is for time-limited reporting, perhaps five years post-completion. 	<p>Comments noted.</p> <ul style="list-style-type: none"> • These requirements are not for small scale development. However, if major development takes place, including historic buildings, monitoring requirements will be triggered. • The monitoring process outlined in section 8 of the SPD is set by and will be fully managed and operated by the GLA. Chapter 6 of the Be Seen Energy Monitoring Guidance, published in October

Respondent Name	Comments	Council's Response
		<p>2020 outlines that during the in-use stage (RIBA Stage 7), responsibility for monitoring and reporting actual performance rests with the building owner and that the building owner is required to monitor and report annual energy performance data via the GLA's 'be seen' spreadsheet for at least five years once the defects liability period (DLP) is complete.</p>
<p>Earl's Court Area Action Group (Bella Hardwick)</p>	<p>ECAAG's submission to the Draft London Plan included Key Performance Indicators on transparency. What standards of reporting will the Council insist on ahead of a redevelopment and what penalties for non-compliance with these standards will there be and how would this be dealt with by the Council and the GLA?</p>	<p>Comments noted.</p> <p>The GLA have published Be Seen Energy Monitoring Guidance which outlines in detail the standards of reporting required (https://www.london.gov.uk/publications/be-seen-energy-monitoring-guidance).</p> <p>It is unlikely that we can enforce against under performance of a building, but monitoring will help refine policies and close performance gap in due course.</p>
<p>CAMELLIA Research Project Imperial College London (Ana Mijic Pepe Puchol-Salort)</p>	<p>Very often there is a substantial difference between the predictions and the actual energy performance of buildings. This initiative will be very useful because it will help to study in more depth and identify the so-called "performance gap" of buildings. This should be extended not only to energy, but for water consumption levels too. As said in Section 5, it will be very interesting to look at the water management system holistically, with standards such as the PRC (Property Resilience Certificate).</p>	<p>Support noted.</p> <p>The monitoring processes and requirements outlined in section 8 of the SPD are set by and will be fully managed and operated by the GLA. The Council is required to follow these under current planning legislation which requires local plan policy to conform with the higher tiers of planning policy.</p>

Respondent Name	Comments	Council's Response
	It is also very important to understand the role of scientific models going towards the digital twins in an accurate manner.	

Section 9: Retrofitting Existing Buildings

Q12: Would you consider carrying out retrofitting works to your property to increase their energy efficiency?



Q13: If yes, is the guidance provided helpful and do you have any comments on section 9?

Respondent Name	Comments	Council's Response
<p>Ladbroke Association (Sophia Lambert)</p>	<p>WINDOWS IN CONSERVATION AREAS. The document rightly makes the point that windows are a particularly vulnerable elements of a building as they are relatively easy to replace or alter. Often windows are replaced for no good reason other than that there is a new fashion in windows. In the late Victorian and Edwardian periods, many of our early Victorian houses replaced existing widows with bow windows. Over the past few decades the fashion has been for picture windows. Now metal-framed crittal style windows are all the rage.</p> <p>KEEPING TIMBER WINDOWS. We therefore welcome the statement in paragraph 9.17 of the document that: "Traditional windows can usually be simply and economically repaired, typically at a cost significantly less than replacement. For timber windows this is largely due to the high quality and durability of the timber that was used in the past (generally pre-1919) to make windows." In respect of windows in conservation areas, we would also like it pointed out that generally timber windows – especially with appropriate double glazing – have better insulating qualities than metal framed ones.</p> <p>The document could helpfully point to detailed RBKC guidance (we would suggest it be written formally into an SPD on window design) on approved design for</p>	<p>These are useful additional details for consideration. The issue of windows is a multi-faceted one which merits further amplification, and the Council is planning additional householder guidance dedicated to this topic, related to and complementary with specific guidance set out in conservation area management plans.</p> <p>Agreed that something could be added regarding air conditioning or 'comfort cooling'. Perhaps, after paragraph 9.33: -</p> <p><i>Proposals for new air conditioning or 'comfort cooling' systems will be considered in relation to their impact on heritage assets. In the currentl climate, despite some exceptional warm spells, they are not neccesary for more than a few weeks every year. Alternative measures such as closing curtains or blinds, including solar reflecting blinds, during the day are low impact but can keep internal temperatures down. Internal shutters can als0 be effective in keeping the heat out in hot weather and for acoustic insulation. External shutters or awnings may be acceptable in certain circumstances, depending on their effects on the heritage interests of listed buildings or conservation areas.</i></p> <p>A little more could also be said about roof insulation, perhaps a new paragraph after para. 9.12: -</p>

Respondent Name	Comments	Council's Response
	<p>retrofitting or providing new timber windows with double glazing units both in conservation areas and for listed buildings.</p> <p>Secondary glazing. We welcome the reference in paragraph 9.23 to the benefits of secondary glazing. It should also be pointed out that, although modern double-glazing is just as efficient as secondary glazing, the latter still has the edge in terms of reducing the impact of external noise.</p> <p>ENLARGING WINDOWS. The last few decades have also seen a trend towards enlarging windows, to let in more light and – in the case of picture windows – to give the impression of reducing the barrier between indoors and outdoors. We can well understand the attractions. However, as paragraph 5.5 of the document makes clear, a higher glazing ratio brings problems. Bigger north-facing windows are likely to lead to extra heat loss; and larger south-facing ones carry the risk of summer over-heating. Moreover, large windows can cause light pollution, not only affecting the amenity of the neighbours but – where they face a green space – having a disturbing effect on wildlife. We therefore urge that this document should have a clear recommendation against enlarging windows (unless it is really necessary because there is inadequate internal light) and against large areas of glazing. The latter is of course also very much out of character when it is</p>	<p><i>Insulation of roof areas can make a significant impact in terms of energy saving and keeping summer temperatures lower, and measures such as laying insulation on the floor of the loft would have minimal impact in heritage terms. Insulation applied under the roof covering to make a warm roof space can have more intrusive effects on the fabric or appearance of the building, for instance through raising the ridge height, and will be looked at on its merits.</i></p>

Respondent Name	Comments	Council's Response
	<p>installed on Georgian and Victorian buildings, so this would be double win.</p> <p>SKY-LIGHTS. There are frequent planning applications in our area for sky-lights and roof-lights in the slope of the roof, usually in connection with dormer extension. We think it should be pointed out that this sort of window, because it receives so much direct sunlight, is particularly bad as regards both keeping cold out in winter and keeping the heat out in summer. Built out dormer windows are better, but unfortunately can be harmful to heritage buildings.</p> <p>SUMMER OVER-HEATING AND RETROFITTED AIR CONDITIONING. With the increasing summer temperatures, this is one of the biggest problems facing existing buildings and we urge that it be given its own section.</p> <p>There is no doubt that it is a particularly thorny problem. There is a growing number of planning applications for retrofitting air-conditioning units, and these are undoubtedly by far the most efficient means of summer cooling. However, they come at a very considerable environmental cost. Their energy use is fiendishly high; as they extract heat from inside and push it outside, they add to the ambient external temperature; and they can also be extremely unsightly. Moreover, except in exceptional weather,</p>	

Respondent Name	Comments	Council's Response
	<p>they are normally only really needed for few weeks a year. We would like to see a policy that requires the investigation of other avenues before planning permission is given for air conditioning units.</p> <p>To some extent it is a question of persuading people to adjust their lifestyle to a more Mediterranean one in which shutters and curtains are kept closed during the daytime, especially in south-facing rooms. Paragraph 9.24 refers to the benefits of wooden shutters for reducing heat loss through windows. But they are also extremely effective in keeping the heat out in hot weather and for acoustic insulation. Solar reflecting roller blinds are an alternative that may be easier to install in many older buildings and may also be more stylistically acceptable than heavy curtains, which are out of sync with the current minimalist fashion.</p> <p>The installation of internal shutters is we suspect likely to be acceptable in conservation areas and in most listed buildings. Retrofitted external shutters, on the other hand, are likely to be unacceptable on most of the borough's heritage buildings. But when it comes to new build, we would see merit in encouraging developers to consider external shutters as an integral part of their design.</p> <p>Awnings may also be useful on south-facing</p>	

Respondent Name	Comments	Council's Response
	<p>windows, and indeed there is evidence of the use of awnings in Victorian times on a number of buildings in Kensington and Chelsea (e.g. Stanley Crescent) – although care would be needed not to affect the heritage value of historic buildings.</p> <p>Roof insulation can take the form either of insulating material on the floor of the loft or insulation under the tiles. The former is more effective at stopping the heat coming through the roof from reaching the bedrooms below and should therefore be encouraged. The same of course applies to keeping out the winter cold.</p> <p>There are now some very efficient fans (e.g. Dyson) which use a lot less electricity than air conditioning.</p>	
Michael Stock (Michael Stock)	Very clear use of option tables and traffic lights, Excellent.	Support noted.
Greg Hammond	While I am a lay commentator (and councillor), I thought the guidance in this section was particularly well laid out.	Support noted.
Anselm Frost	<p>Helpful? - partially yes. Context of my comments - Listed Building Consent ("LBC") and consent in Conservation Areas</p> <p>Private individuals who own flats are likely to have three key considerations in relation to retrofitting energy saving measures: (i) the absolute cost; (ii) the</p>	In relation to iii, with which this planning document can engage, much of the listed building consent process is set in legislation and regulation, so the Council is constrained in the degree of engineering of the process we can do.

Respondent Name	Comments	Council's Response
	<p>return on the expenditure; and (iii) how onerous getting Council permission will be (including how much time is required preparing documents). My view is that in order to maximise local residents' co-operation with its Borough energy saving aspirations, the Council needs to be perceived to be easy to deal with, helpful in getting applicants over the line with a "reasonable compromise" solution, "light touch" with requirements for minor applications, and cheap to deal with.</p> <p>In relation to (iii) above (i.e. how onerous the permission process is), I suggest that the Council looks at re-engineering the LBC process to make it as easy and cheap as possible for private applicants with little experience of the planning process and perhaps little aptitude for writing the complex documents required. A few suggestions (in good part, based on a very limited understanding of the Council's internal procedures): (a) Heritage Statements: if one has been lodged by a different leaseholder in the building, the applicant should be able to adopt most of it by reference, and just add detail relating to the specific flat; (b) the Council could produce pro-forma Design and Access Statements for common projects it would like to encourage leaseholders to undertake (e.g. secondary glazing); (c) the Council should consider a formal or informal tiered system, with less onerous scrutiny of projects</p>	<p>As long as heritage statements address the significance of the heritage assets affected and the impact of the specific proposals they need only be as lengthy or detailed as is necessary to achieve this. There is no particular constraint on how a heritage statement is sourced provided it fulfils this task, and leaseholders could co-operate to achieve this in the way you suggest.</p> <p>The intention of the Greening SPD is to help applicants better to understand the process. We are planning additional householder guidance on the issue of windows to support applications, including those for listed building consent, and other issues may emerge which would benefit from more detailed coverage. We will try to make these as detailed as possible, albeit that we have to avoid unhelpful or misleading over-generalisation.</p> <p>Boiler flues can be visually intrusive, and there would be nothing unusual in seeking LBC for the installation of one, in line with national legislation.</p> <p>Team Leaders retain scrutiny over planning and listed building consent applications.</p> <p>The issue of an alternative planning line is beyond the remit of this document but is noted as a suggestion.</p> <p>The SPD has been fully available for public consultation.</p>

Respondent Name	Comments	Council's Response
	<p>below a certain threshold e.g. price. (As an example, a flat in the next building to mine had to go through the full LBC process to change the flue on its boiler protruding outside the side passage of the building); (iv) perhaps Case Officers' Managers should give general and case-specific guidance to Case Officers on what would be excessive requests for detail in minor (and maybe broadly uncontroversial) applications; and (v) the Council could have a second Planning Help phone line available only for private home owners and their tradespeople (like secondary glazing contractors) seeking permission for projects under Section 9 of this SPD (not open for professionals like architects, nor for developers); and (vi) arrange for some ordinary leaseholders to review the SPD and make it user friendly (for instance Paragraph 9.52 is an example of off-putting text).</p> <p>In relation to the choice of energy efficient heating equipment, the financial cost and the slow and onerous process of obtaining a Licence for Alterations from the freeholder is likely to be a major deterrent for leaseholders (e.g. it would be required for heat pumps, but not for replacing a gas boiler). The Council might be able to negotiate a streamlined and cheap Licence for Alterations process with major residential landlords in the Borough, and possibly set up pro-forma Licence for Alterations documents for</p>	<p>Comment on para. 9.52 noted. It is a technical point but will be reviewed for clarity.</p> <p>The issue of freeholder licensing is noted, but as a parallel legal mechanism to the planning system, is beyond the scope of this document.</p>

Respondent Name	Comments	Council's Response
	small freeholders - perhaps agreed with a property trade body.	
Gaunt	Up to a point. Like many buildings in the borough our block of mansion flats is listed Grade 2 as well as being in a Conservation Area. It is indicated that we would not obtain permission for replacement of existing single glazed sash windows with double glazed replacements. This does not seem sensible as long as the appearance of the building is not materially altered	<p>The Council has a legal duty to preserve the special architectural interest of listed buildings and the character and appearance of conservation areas. Thus, the approval of appropriate retrofitting measure will always have to be a balance between those duties and the energy savings to be achieved. Decision making in historic buildings is guided by national policy and informed by reams of advice published by Historic England, government's heritage adviser, much of which focuses on retrofitting measures. The Council's decisions in this area are made in the light of these and related documents.</p> <p>With all listed buildings, decision making will depend on the specific circumstances of the case, but original windows – some of which are over 100 years old - are normally considered to be important survivals, to be retained unless individual circumstances suggest replacement may be possible. Secondary glazing is an alternative course of action which can secure significant energy savings while preserving special interest. Additionally, the whole life costs of double glazing, which may last for no more than 25 years, need to be considered. There may, of course, be circumstances in which new double glazing may be appropriate, but they can only be identified on a case-by-case basis.</p>

Respondent Name	Comments	Council's Response
Luisa Cicognani	<p>What the policy fails to state is that solid floors are much better at reducing energy consumption than carpets and also if natural material contribute to the circular economy. this is totally missed</p>	<p>Carpets will add an extra insulating layer to wooden floors. If concrete floors are referred to, they tend to be present only at ground/lower ground floor level in traditionally constructed buildings, and it would not normally be feasible or appropriate to install them at other levels.</p> <p>There is a good point made that natural materials are more capable of recycling, and this can be reflected in the text, perhaps at the end of part 4 on the whole life-cycle approach.</p>
Sabine Laurent Varoutsi	<p>I find the guidances helpful but insufficient. There are no major changes compared to what is permissible at the moment, as a consequence, we cannot expect the energy efficiency of existing dwelling to be massively improved. Most dwellings in the borough are in a conservation area. The borough should not prevent people to install double or triple glazing. In fact it should become mandatory. The historical character of the borough will not be impacted from the moment the replacement windows keep the same frame (sash or other). Wall Insulation is a also a major improvement in the energy efficiency of a building; yet the only permissible way is currently to do an internal insulation which cannot be seriously considered by most owners due to its constraints (loss of space and it demands a major refurbishment) . Again, the borough should reconsider its position with respect to external insulation in conservation</p>	<p>The Council has a legal duty to preserve the special architectural interest of listed buildings and the character and appearance of conservation areas. Thus, the approval of appropriate retrofitting measure will always have to be a balance between those duties and the energy savings to be achieved. Decision making in historic buildings is guided by national policy and informed by reams of advice published by Historic England, government's heritage adviser, much of which focuses on retrofitting measures. The Council's decisions in this area are made in the light of these and related documents.</p> <p>Our advice has to be realistic about the likely success of proposals for energy saving measures, to avoid unnecessary costs to residents. We do, in our traffic lights table, acknowledge that there may be circumstances in which external cladding of buildings in</p>

Respondent Name	Comments	Council's Response
	<p>area. For instance, external insulation could be done at the back of each house and not at the front to preserve the appearance. It would not impact the character of those houses. The back would not look like brick anymore, it would have a white render, is it such a strong impact to the character of the borough? It is particularly relevant for all the recent extensions made at the back of each dwellings: those are poorly insulated, typically made with thin walls and a major source of energy consumption.</p>	<p>conservation areas will be acceptable. In some conservation areas the pattern and materiality of rear elevations also makes a positive contribution to the character and appearance of the area, so it would be misleading to make any generalised statements about this, although we are always happy to advise on particular circumstances.</p>
G Thomson	<p>The principle of retrofitting buildings to improve their efficiency is supported, albeit it is unlikely to be applicable to that part of the Earls Court site within RBKC. As set in our response to Question 3, the Council should recognise that there may be some circumstances where it is more appropriate to demolish and re-use the materials.</p>	<p>There may be circumstances in which demolition and re-use of materials is appropriate.</p>
Historic England (Katie Parsons)	<p>With part funding from Historic England, the STBA has published guidance on retrofitting traditional buildings based on current research and practice. Planning Responsible Retrofit of Traditional Buildings https://historicengland.org.uk/images-books/publications/planning-responsible-retrofit-of-traditional-buildings/</p>	<p>This is a useful document, which is actually in the list of further sources of information.</p>
KRACR (Chris Lenon)	<p>The comments are helpful in setting out the balance of considerations in retrofitting. The requirement that glazing should be single not double should be reviewed if suitable double glazed</p>	<p>The Council has a legal duty to preserve the special architectural interest of listed buildings and the character and appearance of conservation areas. Thus, the approval of appropriate retrofitting measure will</p>

Respondent Name	Comments	Council's Response
	<p>units are used. Other authorities do permit double glazed units. Given that this is a cost effective method of improving efficiency, the council should review which types of double glazing units can be approved. To quote from one of many window providers:</p> <p>There are situations where replacement windows that are clearly a later addition, tastefully made in the original style would be accepted after negotiations with the local authority and English Heritage. To apply you would need to submit technical drawings as replacement windows are subject to detailed scrutiny.</p> <p>The development of newer solar pv (ie solar tiles) should be considered in the approval of solar installations in sensitive locations.</p>	<p>always have to be a balance between those duties and the energy savings to be achieved. Decision making in historic buildings is guided by national policy and informed by reams of advice published by Historic England, government's heritage adviser, much of which focuses on retrofitting measures. The Council's decisions in this area are made in the light of these and related documents.</p> <p>With all listed buildings, decision making will depend on the specific circumstances of the case, but original windows – some of which are over 100 years old - are normally considered to be important survivals, to be retained unless individual circumstances suggest replacement may be possible. Secondary glazing is an alternative course of action which can secure significant energy savings while preserving special interest. Additionally, the whole life costs of double glazing, which may last for no more than 25 years, need to be considered.</p> <p>There may, of course, be circumstances in which new double glazing may be appropriate, but they can only be identified on a case-by-case basis.</p>
TfL Planning, Transport for London (Richard Carr)	<p>Chapter 9 – Retrofitting existing buildings</p> <ul style="list-style-type: none"> • Retrofitting buildings could extend to looking at unused parking spaces and other dead spaces to be 	<p>This is a good idea in principle, and in practice we see applications for development along those lines.</p>

Respondent Name	Comments	Council's Response
	converted to provide additional housing or green space	
Environment Agency (Lisa Mills)	<p>We welcome the inclusion of retrofitting existing buildings to improve their energy efficiency. We recommend that new non-residential commercial buildings are required to achieve a BREEAM 'excellent' rating for water efficiency (or an equivalent rating with any successors). We strongly recommend the retrofitting of existing buildings where opportunities arise through refurbishments and changes of use. There are a number of BREEAM Technical Standards documents to support retrofitting for commercial and residential buildings we recommend you refer to.</p> <p>In addition, development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the drainage hierarchy as identified in Policy SI 13 Sustainable drainage in the draft (2019) London Plan. Please also refer to the London Sustainable Drainage Action Plan that contains a series of actions to make the drainage system work in a more natural way with a particular emphasis on retrofitting.</p>	<p>This is a helpful suggestion, and we will explore adding requirements for water efficiency in line with BREEAM in policy formulation for the New Local Plan.</p>
St Helen's Church (Steve Divall)	My comment is in relation to Windows (sections 9.15-9.19).	The Council has a legal duty to preserve the special architectural interest of listed buildings and the character and appearance of conservation areas. Thus,

Respondent Name	Comments	Council's Response
	<p>9.15 comments that: 'the addition of double glazing can be seen as a quick win in improving the thermal efficiency of buildings' (emphasis added). Would it not be more accurate to say that it is a quick win in improving the thermal efficiency of buildings?</p> <p>Everything else that can be done to improve the energy efficiency of the house I live in has been done already, but it is still a cold, draughty house. It would benefit enormously from replacing the windows with sealed units (which would match the flats opposite).</p> <p>With the main argument against allowing such a change being appearance, is this not an example of preferencing style over substance? Would it not be better to allow greater flexibility, so as to maximise energy efficiency even if houses look different as a result of that?</p>	<p>the approval of appropriate retrofitting measure will always have to be a balance between those duties and the energy savings to be achieved. Decision making in historic buildings is guided by national policy and informed by reams of advice published by Historic England, government's heritage adviser, much of which focuses on retrofitting measures. The Council's decisions in this area are made in the light of these and related documents.</p> <p>With all listed buildings, decision making will depend on the specific circumstances of the case, but original windows – some of which are over 100 years old - are normally considered to be important. They are material survivals, evidence of historic skills as well as their contribution to the historic appearance of the building, to be retained unless individual circumstances suggest replacement may be possible. Secondary glazing is an alternative course of action which can secure significant energy savings while preserving special interest. Additionally, the whole life costs of double glazing, which may last for no more than 25 years, need to be considered.</p> <p>There may, of course, be circumstances in which new double glazing may be appropriate, but they can only be identified on a case-by-case basis. There will be much greater flexibility for unlisted buildings and buildings outside conservation areas.</p>

Respondent Name	Comments	Council's Response
Fernando Lobo	There should be discounts or government incentives to carry out these works. Most flats in the area are old and inefficient, but the construction costs are too expensive to be worth the investment.	Noted, but this document will not be able to secure these improvements.
DP9 (Dan Fyall)	N/A	Noted.
RBKC (Charles O'Connor)	Helpful. Important to make clear the importance of retaining historical architectural features, especially windows. The document is good on this.	Noted.
Cornwall Mews South (West Side) RA (Philippa Jill Manasseh)	I have considered it but I believe but is not possible and I would welcome advice.	Not clear what this comment means, but happy to provide detailed advice on a particular building.
V Rowlands	Yes, it's helpful.	Noted.
South Kensington Estates (Tim Butler)	The guidance is helpful, but we are concerned that restrictions in conservation areas and on listed buildings could limit the environmental impact. A greater presumption in favour of improving energy standards is needed.	The Council has a legal duty to preserve the special architectural interest of listed buildings and the character and appearance of conservation areas. Thus, the approval of appropriate retrofitting measure will always have to be a balance between those duties and the energy savings to be achieved. Decision making in historic buildings is guided by national policy and informed by reams of advice published by Historic England, government's heritage adviser, much of which focuses on retrofitting measures. The Council's decisions in this area are made in the light of these and

Respondent Name	Comments	Council's Response
		related documents and are not unusually limiting in that respect.
Ms Sarkis	<p>We need much more guidance for roof insulation. There is great cost in reroofing and great danger of condensation.</p> <p>Mansion blocks need particular help as service charges per square foot are usually higher than in conversions so there may be resistance to investing in higher levels of insulation and possibly disruptive works for example putting a ground source heat pump in a communal garden but I would see this as enormously beneficial.</p> <p>I strongly oppose a relaxed view of cumulative noise from air source heat pumps as I remember complaining to then MP Sir Alan Clark about air conditioning units becoming unbearable and numerous. Therefore I feel it should be mandatory to ensure absolutely no increase in decibel level. Air conditioning units should not be allowed except in hospitals.</p>	<p>We can review advice on roof insulation and provide links to additional sources of information where possible.</p> <p>Links to the following Historic England publications can be inserted in the list of additional information:</p> <p>-</p> <p>https://historicengland.org.uk/images-books/publications/eehb-insulating-pitched-roofs-ceiling-level-cold-roofs/</p> <p>https://historicengland.org.uk/images-books/publications/eehb-insulating-pitched-roofs-rafter-level-warm-roofs/</p> <p>https://historicengland.org.uk/images-books/publications/eehb-insulating-flat-roofs/</p> <p>The Council is aware of the noise impacts of air source heat pumps – addressed at the top of p.39.</p>
Kensington Society (Sophia Lambert)	<p>Section 9: Retrofitting</p> <p>This needs to be expanded into a full guidance document for householders setting out how they can be greener, not just what they need to think of when</p>	Noted.

Respondent Name	Comments	Council's Response
	retrofitting. In particular, it needs to cover over-heating and air-conditioning, and resident behaviour.	
St Helen's Residents Group (Jenny Harborne)	No I think that individual housowners should be advised to seek expert help for their homes- all homes are different and needs proper technical assessment and advice.	Noted.
Cadogan Estates Limited (Jane Henshaw)	<ul style="list-style-type: none"> • More allowance on secondary and double glazing should be encouraged, in particular in relation to the restrictions for heritage assets. • In relation to the requirement for boilers, we recommend these are hydrogen ready. 	The Council has a legal duty to preserve the special architectural interest of listed buildings and the character and appearance of conservation areas. Thus, the approval of appropriate retrofitting measure will always have to be a balance between those duties and the energy savings to be achieved. Decision making in historic buildings is guided by national policy and informed by a large quantity of detailed advice published by Historic England, government's heritage adviser, much of which focuses on retrofitting measures. The Council's decisions in this area are made in the light of these and related documents and are not unusually limiting in that respect.
Earl's Court Area Action Group (Bella Hardwick)	ECAAG's submission to the Draft London Plan included Key Performance Indicators on transparency. What standards of reporting will the Council insist on ahead of a redevelopment and what penalties for non-compliance with these standards will there be and how would this be dealt with by the Council and the GLA?	This point is not fully understood but appears to relate to new development rather than retrofitting.

Respondent Name	Comments	Council's Response
CAMELLIA Research Project Imperial College London (Ana Mijic Pepe Puchol-Salort)	This guidance is very useful and comprehensive; however, it seems mainly focused on historic or existing residential buildings. It would be interesting to consider the conversion and retrofit of empty office and working spaces (especially after the covid-19 pandemic).	Noted. This is a good point, although many of the Council's commercial buildings are also listed or in conservation areas and relatively small in scale, so the issues will be similar.
Diocese of London (Sue Lewin)	<p>Pages 46 – 47 are substantially sound, but the requirement in page 49 for irreparable single glazed windows to be replaced by new single glazing is frankly unsustainable. Any marginal detriment caused by double glazing (if well and sympathetically designed) is negligible compared to the energy loss through single glazing. We strongly urge that this requirement be dropped.</p> <p>Pages 5 and 49. Net zero will never be achieved in RBK&C unless serious consideration is given to a wider range of measures to listed buildings than have hitherto been entertained. Almost by definition, an emergency entails mitigation and management by means of exceptional measures that might be unacceptable in normal circumstances. The balance may be expected to shift substantially between assessments of impacts and public benefit (in particular climate change mitigation) as required by the NPPF (page 10).</p> <p>Page 52, 9.4.1 is welcome. In page 58, it is not just when residential that unlisted buildings benefit from conditional exemption from planning permission for solar PV.</p>	<p>The Council has a legal duty to preserve the special architectural interest of listed buildings and the character and appearance of conservation areas. Thus, the approval of appropriate retrofitting measure will always have to be a balance between those duties and the energy savings to be achieved. Decision making in historic buildings is guided by national policy and informed by reams of advice published by Historic England, government's heritage adviser, much of which focuses on retrofitting measures. The Council's decisions in this area are made in the light of these and related documents.</p> <p>With all listed buildings, decision making will depend on the specific circumstances of the case, but original windows – some of which are over 100 years old - are normally considered to be important. They are material survivals, evidence of historic skills as well as their contribution to the historic appearance of the building, to be retained unless individual circumstances suggest replacement may be possible. Secondary glazing is an alternative course of action which can secure significant energy savings while preserving special interest.</p>

Respondent Name	Comments	Council's Response
	<p>Page 60. Here and/or elsewhere, the ecclesiastical exemption from listed building consent for internal works in churches in use should be acknowledged.</p>	<p>Additionally, the whole life costs of double glazing, which may last for no more than 25 years, need to be considered.</p> <p>There may, of course, be circumstances in which new double glazing may be appropriate, but they can only be identified on a case-by-case basis. There will be much greater flexibility for unlisted buildings and buildings outside conservation areas.</p> <p>The Council is happy to acknowledge the existence of the ecclesiastical exemption in relation to works to churches in use for worship. Additional sentence in or footnote to paragraph 9.42:-</p> <p><i>Changes to listed historic churches currently in use for worship by the 'exempt denominations' are governed by the internal systems of these bodies under the Ecclesiastical Exemption (refer to Historic England advice, and guidance from the Department for Digital Media and Sport for further information.</i></p>
<p>Labour Group of Councillors (Mohammed Bakhtiar)</p>	<p>All new major developments must have industrial air purifying systems considered when submitting a planning application. The council through its housing management team needs to explore the possibility of supplying its tenants with household air purifying units and arrange for their regular service as an on-spot remedy for the most polluted parts of the borough. Other housing providers need to be</p>	<p>Noted.</p>

Respondent Name	Comments	Council's Response
	<p>encouraged to follow the lead, while looking into other ways of cleansing the air on an industrial scale through carbon capture and carbon dioxide removal technology which have been used in over 50 countries around the world, and still expanding.</p> <p>The housing management department at the council and all other housing providers in the borough should consider installing solar panels on their buildings when and wherever possible and viable, especially on towers and high rising blocks. For instance; Block B at Trellick Tower is a potential site for a solar panel use.</p> <p>Any future council owned developments must consider, in line with Government Guidance, installing alternative methods instead of gas boilers, as at 50 Verity Close, in keeping with our commitment to build a circular sustainable economy to enable us to reach our Carbon Neutral Goals.</p>	

Section 10: Air Quality

Q14: Do you have any comments on section 10?

Respondent Name	Comments	Council's Response
Jane Whewell	<p>We consider the document misses an opportunity to address fully the significant harm caused to residents, air quality and climate change posed by construction traffic and construction equipment in operation in the Borough. Repeatedly highly polluting, truly ancient, vehicles and equipment are employed within the Borough for demolition, digging and construction work. This is a known problem about which residents have been calling for action for many years. The RBKC code of construction practice, while helpful, does not apply in every case, nor does it apply to permitted development (increasingly covering more and more sorts of different developments) nor to smaller projects. Unless this SPD takes steps to introduce new, more rigorous measures to control emissions from construction and delivery/collection vehicles this will result in continued use of highly polluting (particulates and CO2) vehicles and equipment that cause significant harm. We would ask that this document specifically require that developments/construction work in the Borough may only be undertaken using vehicles and equipment above a certain environmental standard. The same standards should also be applied to delivery and spoil/rubbish collection vehicles as frequently they</p>	<p>Comments noted.</p> <p>The Council is aware that the Borough's air quality is of major concern. Section 10 of the Greening SPD sets out our guidance for how all development proposals can ensure they give due regard to air quality considerations and the requirement that new development must be air quality neutral, requiring no negative impact on air quality. These requirements conform fully with those set out in the New London Plan, Policy SI 1 in particular. Please note that the Air quality neutral objective is soon to be superseded by an air quality positive objective, which the GLA is due to provide guidance on in due course.</p> <p>The Council's Code of Construction Practice (2019) sets out requirements for how construction sites are managed to reduce their impact on residents. These include requirements for construction vehicles to comply with the Low Emission Zone (LEZ) and Ultra Low Emission Zone (ULEZ) and meet European Emission Standards pursuant to the EC Directive 98/69/EC of Euro 4 for petrol vehicles and Euro 6 for diesel vehicles and Euro VI for all lorries and specialist heavy goods vehicles (see pg. 48 for example). This is in-line with the GLA's Non-Road Mobile Machinery (NRMM)</p>

Respondent Name	Comments	Council's Response
	<p>are the worst polluters of all. We would add that any ambiguity in such requirements will be exploited by developers who already frequently fail to abide by the code of construction practice in relation to vehicles, even when they are bound by the code.</p> <p>We are very concerned that the text on page 68 could be used to provide justification for road closures. We are aware of multiple occasions where banning through traffic has actually resulted in significant harm to local residents who require access by vehicles to their own homes for themselves their visitors and tradesmen. We would ask that the text on this page is amended to make clear that unfettered vehicular access to their homes must always be maintained for residents and their visitors and services - and by unfettered we mean unfettered. Suggestions that banning through traffic could be achieved by requiring residents to seek permission for access or that roads are closed or require residents to show permits or use special fobs or keys to gain access are completely unacceptable. We would also ask that those who live on a street where through traffic access might be restricted must be expressly consulted on such proposals which may not go forward where a majority of affected residents are opposed.</p>	<p>requirements. Plant used on construction sites in the borough is audited by Pan-London NRMM Officers who will provide assistance and / or enforcement to sites not meeting the requirements. We refer to our air quality requirements for development construction in section 10 of the SPD (see pg. 69).</p> <p>The Council's Pollution Regulatory Team is also working on developing a new Air Quality Action Plan which will outline interventions, actions and projects that are outside of the remit of the planning system. There is a separate SPG for Air Quality and this is being updated later this year.</p> <p>Regarding road closures, the Council recognises the need to ensure that existing residential and servicing accesses are not unduly prejudiced as part of any traffic management proposals. Any such proposals would be duly consulted upon in line with the Council's Charter for Public Participation.</p>

Respondent Name	Comments	Council's Response
Michal Levin	Suggest planting of trees along bus routes wherever possible- and believe it would be possible on my street, Elgin Crescent W11 2 JD	<p>Suggestions noted.</p> <p>We agree that trees make an important contribution to greening the borough. As noted in section 11 of the SPD, the Council has committed to planting additional trees where possible and the Borough is already home to over 8,000 street trees. This aim is supported by Policy CR6 of the current Local Plan, which states the Council will require the protection of existing trees and provision of new trees.</p> <p>Unfortunately, not all bus routes are able to accommodate trees planted along them. It is not possible to plant trees in the street on the stretch of Elgin Crescent between Portobello and Ladbrooke Grove as they are utility cable runs adjacent to the kerb on the South side. There are a number of existing trees growing in the footpath on the North side and lots of trees on the section to the West of Ladbrooke Grove.</p>
Ladbrooke Association (Sophia Lambert)	<p>LOW TRAFFIC NEIGHBOURHOODS. We welcome the cautious attitude that is taken in paragraph 10.14. It is important that there is agreement from the local community and we applaud the Council for its decision not to proceed with the proposed St Quintin's LTN, despite pressure from the centre. Other London boroughs have experimented with such schemes during the pandemic, not always with happy results. We think that evidence from these schemes needs to be gathered before others are</p>	Support noted.

Respondent Name	Comments	Council's Response
	<p>considered in Kensington and Chelsea. There are, however, a number of more minor interventions that could be taken to facilitate walking and cycling.</p> <p>ELECTRIC VEHICLE CHARGING INFRASTRUCTURE. We welcome the commitment in paragraphs 10.15-10.18. But particularly in areas with a high proportion of car owners living in flats, we wonder if it is physically possible to make adequate provision. It may be that hope should be pinned on new technology, for instance interchangeable and easily removable batteries allowing drivers to stop and a service station and exchange their depleted battery for a fully charged one within minutes.</p> <p>This chapter ought to mention that one of the benefits of the larger green areas is that they are a cool area in hot weather.</p>	
London Wildlife Trust (Mathew Frith)	We support the requirements set out.	Support noted.
Canal & River Trust London (Claire McLean)	<p>Page 64 - 10. Air Quality</p> <p>As well as promoting electric vehicle charging points, the SPD should include consideration of canal -side electric boat charging points. The Trust has trailed these in densely populated areas where engine noise and fumes has been causing disturbance, especially</p>	<p>Comments noted.</p> <p>We will add support for canal-side electric boat charging points in the electric vehicle infrastructure section of Chapter 10 (pg. 68).</p> <p>As outlined in section 10 of the SPD, Policy CT1 of the current Local Plan requires that walking, cycling and</p>

Respondent Name	Comments	Council's Response
	<p>in stretches where the canal is in a cutting and the air/sound does not disperse as quickly. We would support in developing more of these eco moorings as we encourage boat owners to use electricity more than fuels.</p> <p>Page 67 - 10.13 Encouraging Active and Sustainable Travel</p> <p>Specific detail of the Grand Union Canal (Paddington Arm), which is part of the wider cycle network (designated as a Quietway/Cycleway). The canal towpath can support active travel to also address air quality issues, and we would encourage the provision for improving connecting routes to it, as part of the continued development of the network, to include suitable wayfinding.</p> <p>There is also a need to provide alternative cycle routes parallel to the towpath, in order to prepare for the increase in demand on the towpath, which is narrow and not always comfortable for large amounts of commuter cyclists, which can sometimes deter pedestrians for using the towpath, particularly at peak times. The OPDC area regeneration will put additional pressure on the towpath through Kensington and Chelsea for the connection towards Paddington and central London, and the future Kensal Canalside regeneration project will exacerbate this. There will be increasing numbers of residents and visitors to the area, and we support to</p>	<p>public transport are safe, easy, attractive and inclusive for all. We therefore require all development proposals to seek to support sustainable and active transport options and minimise any increase in traffic congestion or on street parking pressure.</p> <p>The Kensal Canalside area is a strategic site allocation identified in the Local Plan. Chapter 5 of the current Local Plan sets out the Council's vision and requirements for development in the area. This includes significant work to add to and improve existing active transport routes, such as walking and cycling in anticipation of an increase in use brought about by the development.</p> <p>The Council's Growth and Delivery Team are developing an SPD for the Kensal Opportunity Area which will set out our requirements for development in the area in more detail.</p>

Respondent Name	Comments	Council's Response
	<p>protect the peaceful nature of the canal for people to continue to enjoy this unique asset for wellbeing and recreation, as well as for commuting.</p>	
<p>Michael Stock (Michael Stock)</p>	<p>Good. The GLA's extension of the ULEZ etc is welcomed and must be supported.</p> <p>I look forward to RBKC options for active travel following the Leader's review of the scrapping of the temporary cycle lanes.</p>	<p>Support noted.</p>
<p>Kerry Davis-Head</p>	<p>REGARDING AIR POLLUTION AND DEVELOPMENT</p> <p>Lots Village has suffered in the past by over development, schemes such as the Chelsea Academy and the Lots Road Power Station site have demonstrated why all available sites should now be greened.</p> <p>The Power Station site was opposed, but was granted planning by higher powers. The Chelsea Academy site was shamefully put through even though it was obvious it is too large a development on too small a site and there was an alternative site with detailed plans drawn up Coronavirus lock down showed the faults in the above schemes. Occupiers of the Power Station have no proper green space of their own, so they use the Lots Village green spaces of Westfield Park and Cremorne Gardens. The Academy has nowhere but the residential streets to queue students whilst trying to conform to separating</p>	<p>Comments noted.</p> <p>Once adopted, the SPD will become a material planning consideration in the assessment of planning applications and therefore its requirements will apply to new developments in the Borough. It cannot be applied retrospectively, however.</p> <p>The Council is aware that the Borough's air quality is of major concern. Section 10 of the Greening SPD sets out our guidance for how all development proposals can ensure they give due regard to air quality considerations and the requirement that new development must be air quality neutral, requiring no negative impact on air quality. These requirements conform fully with those set out in the New London Plan, Policy SI 1 in particular. Please note that the Air quality neutral objective is soon to be superseded by an air quality positive objective, which the GLA is due to provide guidance on in due course.</p>

Respondent Name	Comments	Council's Response
	<p>year groups. Both sites have a large number of vehicles attending.</p> <p>The School Streets scheme does nothing to help any greening, quite the opposite, it encourages extra trips to work around the blockage, and just transfers the engine idling parents to residential properties away from the Tetcott Road entrance to the school. The only space we now have is the Car Pound/Auction House site and the Tideway site (once works are completed). A planning application was submitted for an overlarge building on the Tideway site, seemingly doubling up on the street cleaners and salt provision proposed for the Car Pound/Auction site. Any proposals we have seen for the Car Pound/Auction site appear to be over developed and without green provision. Green space is needed, not development. Green space for both wellbeing but also for the ecology and to mitigate pollution.</p> <p>REGARDING VEHICLES</p> <p>To reduce engine idling: More effective and permanent signage, people take more notice of official looking signs, the current polyboard signs get removed, turned round, and do not look official.</p> <p>Enforcement, deploying community wardens to educate idling drivers, hand out cards, plead with their better nature. Fixed penalties would of course</p>	<p>In addition to the air quality section, almost all sections of the SPD, from the whole life cycle carbon approach, energy policies and retrofitting existing buildings, to urban greening and biodiversity aim to reduce carbon emissions across the Borough, and by doing so, also contribute to improving our air quality.</p> <p>The Greening SPD is intended to supplement the current Local Plan, rather than taking its place or repeating policy. Key themes and objectives of the Local Plan such as Chapter 24 – Respecting Environmental Limits and the promotion of sustainable and active modes of transportation such as cycling and walking over the private car (Policy CT1 for example) remain valid. We don't wish to penalise private car owners, just to encourage more active and sustainable modes of transportation. Similarly, we do not wish to encourage cycling and the expense of pedestrian.</p> <p>The Council is currently in the process of a New Local Plan Review with the aim to adopt a New Local Plan in 2023. A key element of the work on the new plan will be to transfer the guidance outlined in this SPD, such as the guidance on air quality, into Local Plan policy. This will be an opportunity to review the impact of the SPD and improve upon it where needed, in line with the New London Plan and NPPF.</p> <p>It is important to note that the issue of air quality is a larger problem that planning alone cannot solve. The</p>

Respondent Name	Comments	Council's Response
	<p>be the better deterrent if policed Design away any holding areas for vehicles to wait/linger Encourage clubs and pubs to have an efficient taxi booking system, the old schemes enforced by licensing have been woefully outdated by Uber. To be in the right place, taxis will wait nearby restaurants, clubs etc at busy times, often engine idling.</p> <p>To reduce pollution: Look at developer lorry routes, National Coach routes etc. Look properly at one way systems to see if they can be reversed, one ways create extra travel for vehicles. Look at illegal/anti-social parking hotspots, for instance beside popular restaurants on the Kings Road (eg The Ivy) where taxis and deliveries frequently hold up buses, and therefore any vehicles behind the blocked bus Identify areas which could have extra trees, green walls, climbers etc. To identify hot spots: Utilise monitoring, even in 'quiet' areas as these might be the pollution hotspots re engine idling. I am sure householders would assist and allow these to be placed on their property Don't penalise existing drivers on non-electric cars. Until electric cars meet the needs of all drivers then</p>	<p>Council's Pollution Regulatory Team are working on developing a new Air Quality Action Plan, which will outline how the Council plans to address the Borough's air quality and will include a range of strategies and interventions that are outside of the remit of the planning system. This is discussed in section 10 of the SPD.</p> <p>The Council's Waste Enforcement Officers already target problem areas in the borough and are authorised to ask idling drivers to switch off their engines. The officer will explain to the driver why they are asking them to do so and can provide a pamphlet with further information. If a driver refuses, our officers can issue a £20 fixed penalty notice which can increase to £40 if unpaid. Residents are able to report idling vehicles through the Council website where an Enforcement Officer will be able to investigate.</p> <p>The Council has an air quality monitoring network comprising of both passive (over 100 diffusion tubes) and automatic monitoring locations (5 strategic sites). The network is reviewed on an annual basis in the Council's statutory Annual Status Report to identify any gaps or local hotspots. The Council is continually investing in this network; recent purchases include four mobile sensors and a PM2.5 monitor for KC2 Cromwell Road. Additionally, the Cambridge Environmental Research Centre (CERC) has been commissioned to undertake a boroughwide exercise to model</p>

Respondent Name	Comments	Council's Response
	<p>the old fashion combustion engine is sometimes the only choice. Not everyone replaces their vehicle every year or leases it, some buy a quality car for long term use, if they already have it then don't penalise them. Maybe consider charging parking per cm, ie according to the space they take up in the street. Have a ratio of engine size to size/weight of vehicle, if over excessive, ie for a Sports car type then impose extra charges, not on someone needing a people carrier for a large family.</p> <p>Don't encourage cyclists at the expense of pedestrians. Wholly pedestrian walkways are needed, a pedestrian is slower than a bike, therefore they have more opportunity to take in pollution as they walk so they need consideration. If you make it safer and more pleasant to walk then some will take less taxis, taxis are often the only safe option whilst cycles and scooters freely roam the pavement.</p>	<p>concentrations of NO2, PM10 and PM2.5 for the years 2016, 2019 and 2022, which help us to identify which parts of the borough meet the air quality objectives.</p>
Molly Bell	<p>I own a house on Oxford Gardens which backs onto the Westway. We have asked for Evergreen trees to be planted to stop the carbon emissions from coming into our homes and to hide the motorway from view. I even spent hundreds on trees to donate to the Westway development project and they were never planted.</p>	<p>Comments noted.</p> <p>The green space in question is maintained by the Westway trust or development group. The Council has no jurisdiction to plant trees in that area, which is to the rear of the private properties at the Western End of Oxford Gardens, on the South side facing the Westway.</p> <p>A Council arboriculture officer has carried out a site visit and confirmed that there are a number of semi-mature</p>

Respondent Name	Comments	Council's Response
	It is really outrageous to me that the council has failed to listen to these requests.	<p>and mature deciduous trees in the green space close to the rear boundaries and also notes that there is likely not much room to plant more than one or two additional trees.</p> <p>If you have made financial contributions to the Westway trust in the past, then this is a matter between yourself and the trust. We unfortunately have no legal right to plant trees on land that is not owned by the Council.</p>
Luisa Cicognani	Missing air pollution from smelly restaurants. this has to stop.	<p>Comment noted.</p> <p>The Council must investigate reported instances of nuisance odours from business premises across the borough. You can submit a complaint via the Council website - https://www.rbkc.gov.uk/global/report-it/report-problem at any time and we will investigate the issue.</p>
Sabine Laurent Varoutsi	There are no mention of developing protected cycle lanes. The report acknowledges that there is a need to promote active travel but the only efficient way to do so, cycling is not properly addressed. The major deterrent for not using a bicycle is the lack of safety on our roads. The quiet road scheme is good but it cannot cover all directions. There is in particular a major security issue in the borough when cycling east west as there are only major roads to go to Hammersmith and Sheperdsbush. Protected cycle lanes are needed on Holland Park avenue and High Street Kensington. Any development on those roads	<p>Comments noted.</p> <p>As outlined in section 10 of the SPD, Policy CT1 of the current Local Plan requires that walking, cycling and public transport are safe, easy, attractive and inclusive for all. We therefore require development proposals to seek to support sustainable and active transport options and minimise any increase in traffic congestion or on street parking pressure.</p> <p>The Council is aware of requests for an east-west cycle route and the feelings on both sides of the argument, particularly in relation to the former cycle lanes on</p>

Respondent Name	Comments	Council's Response
	<p>should factor in the need for the extra space (if needed) for having protected cycling lane. in addition, parking provision for deliveries should be included in the design of new developments so that the major roads are not used as a parking spot.</p>	<p>Kensington High Street. The Council's Leadership Team has decided that, whilst the former temporary scheme will not be reinstalled, officers should begin comprehensive research into an alternative scheme, based on longer-term data.</p>
G Thomson	<p>ECDC supports the principle of measures to improve air quality within the Borough. As new proposals for Earls Court are progressed ECDC will be developing a new air quality strategy, consistent with national and London Plan policy. Policy requirements above and beyond London Plan policies would need to be thoroughly tested and balanced against other sustainability credentials and policy requirements to ensure they are deliverable.</p> <p>It should be noted that outdoor air quality is beyond the control of any one stakeholder. Improving this on a borough / city level requires a high level of multi-stakeholder collaboration and participation.</p> <p>With regards to the need for large scale development to consider how local air quality can be improved across the area of the proposal as part of an air quality positive approach, the SPD should acknowledge that there is currently no guidance on the Air Quality Positive approach. ECDC expects that guidance will be published in due course but until that time there should be flexibility afforded to applicants.</p>	<p>Support and comments noted.</p> <p>It is true that the issue of air quality is a larger problem that planning alone cannot solve. The Council's Pollution Regulatory Team are working on developing a new Air Quality Action Plan, which will outline how the Council plans to address the Borough's air quality and will include a range of strategies and interventions that are outside of the remit of the planning system. Residents and businesses will have the opportunity to comment and help shape the actions that will form the basis of the AQAP. Actions will include crosscutting projects that will include joined-up working between numerous Council teams and external stakeholders. This is discussed in section 10 of the SPD.</p> <p>The GLA will be publishing further guidance on the Air Quality Positive approach. We will add a reference to this on pg. 66.</p>
Knightsbridge Neighbourhood	<p>CAL's main comments on the Draft Greening SPD are:</p>	<p>Comments noted.</p>

Respondent Name	Comments	Council's Response
Forum (Simon Birkett)	<p>1. We have found no evidence that the SPD will ensure that RBKC's commitment to net zero by 2040 is achieved across the borough. Please 'test' it robustly.</p> <p>2. CAL does not consider your SA/SEA screening reliable because it applied ODPM 2005 and was consulted upon in July/August 2018. Your screening seems to conclude that an SA/SEA is not required because the proposals in the SPD will not have a significant impact when transformation is required.</p> <p>3. In particular, please strengthen the wording throughout the SPD from 'minimise', 'reduce' and 'prioritise' to wording that: defines clear 'end points' by 2040; puts more robust obligations on developers and applicants; and requires action on all development or refurbishment requiring planning permission, not simply stricter requirements on major development as seems the case.</p> <p>4. CAL wholeheartedly supports and encourages full opposition by RBKC to the installation of CHP and/or other fossil fuel power plant. There is no place for such plant given: the rapidly decarbonising grid; that it will use sparse 'carbon budget'; and it will need to be removed by 2040 at the latest.</p> <p>5. Please align the measures and proposals in the SPD fully to the Climate Change Committee's Sixth Carbon Budget (published 9 December 2020).</p> <p>6. Please allow and support fully electric homes and other buildings as an alternative to the use of heat</p>	<p>1. The SPD is one facet in achieving the 2040 target. The Council will produce a separate Green Plan bringing together aspects across the Council in a holistic way. The SPD only links with what planning can influence in the built environment.</p> <p>2. Comment noted. The Council followed ODPM 2005 guidance but also the latest guidance included in the gov.uk webpage: https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#sustainability-appraisal-requirements-for-local-plans-and-spatial-development-strategies. This guidance states that “<i>Supplementary planning documents do not require a sustainability appraisal but may in exceptional circumstances require a strategic environmental assessment if they are likely to have significant environmental effects that have not already have been assessed during the preparation of the relevant strategic policies.</i>” It should be noted that the SPD does not introduce new policy but explains how to implement both, the London Plan and the Local Plan Policies. Both, the London Plan and the Local Plan are supported by a full SEA/SA assessments and documents. All the statutory bodies (Historic England, Natural England and the Environment Agency) confirmed that a Strategic Environmental Assessment or Sustainability Appraisal was not required.</p>

Respondent Name	Comments	Council's Response
	<p>pumps since the former can reduce substantially upfront and maintenance costs. With a rapidly decarbonising grid there should be no carbon deficit from all-electric buildings.</p> <p>7. Please be clear that we need zero air emission buildings not 'net zero carbon' (which introduces fudge and loss of transparency and accountability).</p> <p>8. Please allow double glazed windows explicitly in listed buildings and conservation areas so long as they meet high standards of design and energy performance.</p> <p>9. Please ensure that buildings comply with UK and international standards for air quality i.e. BS EN ISO 16890:2016 (particulate filters); BS EN ISO 10121-2:2013 (gas phase); and BS EN 16798-3:2017 (energy performance) and their successor standards. This is important as buildings become more tightly sealed.</p> <p>10. CAL has found no reference to Air Quality Focus Areas in the draft SPD. These are an important part of the New London Plan and their requirements need to be included fully in the SPD. Please also update the SPD to conform fully with the 'adopted' air quality and energy policies in the New London Plan.</p> <p>11. Please explicitly rule out the use of solid fuels in RBKC.</p> <p>12. Please conform the SPD fully with the New London Plan and the London Environment Strategy 2018. For example, CAL has found no reference to</p>	<p>The Council produced a Screening Statement on the Greening Supplementary Planning Document (SPD) in July 2018 and consulted the relevant bodies: Historic England, Natural England and the Environment Agency. All confirmed that a Strategic Environmental Assessment or Sustainability Appraisal was not required. The Screening Statement and the responses received from the three statutory bodies are available on-line as part of the Draft Greening SPD consultation at https://planningconsult.rbkc.gov.uk/consult.ti/GreeningSPD/consultationHome!</p> <p>3. Appropriate wording is used throughout the SPD and where something is a requirement it is clearly stated. This has to be based on evidence and higher-level policies. We cannot impose disproportionate requirements on small scale development.</p> <p>4. Support noted.</p> <p>5. The Climate Change Committee's Sixth Carbon Budget sets the path to the UK's new net-zero emissions target in 2050. The Council has already established its commitment to meeting net zero carbon by 2040 and this is echoed in the SPD.</p> <p>6. Though heat pumps require an upfront cost to install, direct electric heating is typically more expensive to operate than heat pumps which will lower the cost of heating over the long term.</p>

Respondent Name	Comments	Council's Response
	<p>the importance of renewing 'urban forests' which is a key requirement of the LES 2018.</p> <p>13. Please do not rely on EPUK LAQM guidance for the assessment of air quality in developments. Such guidance was never consistent with the legal obligation to achieve limit values and/or ensure that limit values once attained are not subsequently exceeded.</p> <p>14. Please do not rely so much on 'offset' schemes or contributions for developers to avoid on-site action. Action is cheaper and more effective at 'source'.</p> <p>15. Please check with Thames Water about sewerage systems. In our experience, they now require no increase in peak outflow etc.</p> <p>16. Please recognise that the best SUDS standards should be adopted within this broad definition.</p>	<p>7. The SPD has been drafted in conformance with the London Plan which sets out the requirement for net zero carbon development. We are required to conform with the higher tiers of planning policy (i.e. the London Plan) by current legislation.</p> <p>8. With all listed buildings, decision making will depend on the specific circumstances of the case, but original windows – some of which are over 100 years old - are normally considered to be important. They are material survivals, evidence of historic skills as well as their contribution to the historic appearance of the building, to be retained unless individual circumstances suggest replacement may be possible. Secondary glazing is an alternative course of action which can secure significant energy savings while preserving special interest. Additionally, the whole life costs of double glazing, which may last for no more than 25 years, need to be considered. There may, of course, be circumstances in which new double glazing may be appropriate, but they can only be identified on a case-by-case basis. There will be much greater flexibility for unlisted buildings and buildings outside conservation areas.</p> <p>9. We require BS EN ISO 16890:2016 (particulate filters) for ventilation systems. The standard is specifically stated within our Ventilation Strategy planning condition in order for the development to provide fresh air to the building interior. We don't</p>

Respondent Name	Comments	Council's Response
		<p>specifically state BS EN ISO 10121-2:2013 (gas phase air cleaning devices); and BS EN 16798-3:2017 (energy performance) in our planning conditions but we do include BS EN ISO 10121-1:2014 (gas phase air cleaning media). We request that the whole system is designed to prevent summer overheating and minimise energy usage and the maintenance / cleaning of the systems to be undertaken regularly in accordance with manufacturer specifications. The approved system is then to be fully implemented prior to the occupation/use of the development and thereafter permanently retained and maintained. A post installation report of the approved ventilation strategy is also required for approval prior to occupation.</p> <p>10. We note that reference to Air Quality Focus Areas as outlined in Policy SI 1 of the New London Plan have been omitted and we will add this to para. 10.1 section 10 of the SPD (pg. 64).</p> <p>11. Although we are unable to stop the use of solid fuels in the borough, through the new Air Quality Action Plan and our affiliation with the new GLA lead 'Wood Burning Group' we are looking to promote and support the new legislation that will ban the sale of wet wood and household coal. The Ready to Burn certification scheme will underpin The Air Quality (Domestic Solid Fuels Standards) (England)</p>

Respondent Name	Comments	Council's Response
		<p>Regulations 2020 and will come into force from May 2021 for most fuel suppliers. From January 2022 all new woodburning stoves will have to meet new EcoDesign standards. The clearSkies stove accreditation scheme (launched in September 2020) is an emissions and efficiency accreditation scheme that goes even further than EcoDesign requirements.</p> <p>12. Agreed we will add reference to the London Environment Strategy (2018) and London Urban Forest Plan (2020) in an expanded section on trees in section 11 and 13 of the SPD.</p> <p>13. The IAQM Guidance and subsequent Mayor of London Guidance for the assessment of air quality and dust emissions represent industry best practice and provide the framework for which Air Quality Assessments are undertaken for development projects in London. Although the guidance provides the framework, each site is reviewed on a case by case basis and accordingly addressed by the Council.</p> <p>14. For air quality, a development must demonstrate it has made every effort to minimise, reduce or prevent emissions on site / at source as far as practically possible before an 'offset scheme' or contribution is considered.</p> <p>15. Thames Water are consulted for major applications and provide comments both in terms of water provision and foul water (sewer capacity). Our</p>

Respondent Name	Comments	Council's Response
		<p>current policy in terms of reduction of surface water run-off (CE2g) is supported by Thames Water.</p> <p>16. Agreed. Defra has produced non-statutory SuDS standards and are currently reviewing them. The London Plan also includes a hierarchy which we will refer to in the SPD, both in paragraph 12.14 and in the key guidance table at the beginning of the chapter</p>
Rick Britt	<p>How is RBKC going to improve public transport, when that is in the remit of the GLA / TfL?</p> <p>By far the bulk of traffic pollution in RBKC comes from through and commuter traffic along routes such as the Westway, Cromwell Road, Ken High St etc. I do not see how can RBKC influence or otherwise alter the behaviour of such drivers when they do not live here?</p> <p>Again, in my area I note a substantial number of properties being completely refurbished top to bottom inside and out in order to increase their value prior to being sold; then the new owner immediately refits the building again! So wasteful, how can this be discouraged?</p>	<p>Comments noted.</p> <p>As outlined in section 10 of the SPD, Policy CT1 of the current Local Plan requires that walking, cycling and public transport are safe, easy, attractive and inclusive for all. We therefore require development proposals to seek to support sustainable and active transport options and minimise any increase in traffic congestion or on street parking pressure.</p> <p>It is important to note that the issue of air quality is a larger problem that planning alone cannot solve. The Council's Pollution Regulatory Team are working on developing a new Air Quality Action Plan, which will outline how the Council plans to address the Borough's air quality and will include a range of strategies and interventions that are outside of the remit of the planning system. This is discussed in section 10 of the SPD.</p>

Respondent Name	Comments	Council's Response
		Section 3 of the SPD sets out that the Council will support circular economy principles as required by the New London Plan. This seeks to retention, reuse and recycling of reuse existing buildings and materials where appropriate.
KRACR (Chris Lenon)	Many members are concerned about air quality in RBKC. Measures to improve air quality need to be explained and the benefits arising made clear.	Section 10 of the Draft SPD addresses the issues raised. In addition, the Council's Pollution Regulatory Team are working on developing a new Air Quality Action Plan which will outline air quality interventions, actions and projects that are outside of the remit of the planning system. Residents and businesses will have the opportunity to comment and help shape the actions that will form the basis of the AQAP. Actions will include crosscutting projects that will include joined-up working between numerous Council teams and external stakeholders. This is discussed in section 10 of the SPD. The Council also has an Air Quality SPG, which will be updated later this year.
TfL Planning, Transport for London (Richard Carr)	<p>Chapter 10 – Air Quality</p> <ul style="list-style-type: none"> Under the key guidance to developers and 10.11 reference is made to 'promoting greater use of sustainable transport modes through travel plans.' We would like to see this widened beyond travel plans to encourage developers to adopt, a range of positive measures that encourage greater use of sustainable transport and at the same time reduce 	The Council's Pollution Regulatory Team are working on developing a new Air Quality Action Plan which will outline air quality interventions, actions and projects that are outside of the remit of the planning system.

Respondent Name	Comments	Council's Response
	<p>reliance on car travel which is the major contributor to poor air quality. This includes car free developments and providing high quality design and infrastructure that supports active travel and public transport</p> <ul style="list-style-type: none"> • We welcome the recognition in 10.13 that road transport is a major contributor to poor air quality and that 'Ensuring the local highway network is attractive for walking and cycling and helping to engender better travel choices is therefore a key focus for improving Local Air Quality' In the requirements that follow, reference should be made to the Healthy Streets Approach and Vision Zero which will help to deliver 'walking, cycling and public transport that are safe, easy, attractive and inclusive for all' • The requirement that 'All development proposals should seek to support sustainable and active transport options and minimise any increase in traffic congestion or on street parking pressure' does not go far enough. There should be a much stronger emphasis on reducing car use and parking restraint in line with the borough's target of 85% of trips by non-car modes by 2041. • We welcome the contents of the 'How do I do it?' box including the requirements to locate high trip generating development in areas with sufficient public transport capacity, and to provide improved permeability for pedestrians and cyclists, improvements to public transport where appropriate and cycle parking in line with the London Plan 	

Respondent Name	Comments	Council's Response
	<ul style="list-style-type: none"> • In 10.14 we welcome the proposed improvement of facilities for active travel including cycling and walking. The continuity of cycle infrastructure including connections with the network in adjacent boroughs is a particular issue. We will aim to work with the Council to consider the expansion of cycle hire in areas where this is viable. We also welcome the Council's intention to consider opportunities to introduce new restrictions to remove through traffic from residential roads. This may also be appropriate in other areas of poor air quality such as outside schools, local centres and High Streets. Plans to restrict traffic and to create pedestrian areas are generally welcomed and should ensure that access by bus passengers is considered when they are designed • In 10.15 – 10.18 we welcome improved provision of charging infrastructure for electric vehicles. However this shouldn't avoid the urgent need for policies and measures that go beyond encouragement of electric vehicles which still cause pollution in the process of energy generation and contribute to traffic congestion. • We welcome that existing parking in existing developments is encouraged to be converted to electric charging points. However, this could go much further by including proposals to encourage the conversion of existing residential, retail, workplace and commuter parking to alternative uses including 	

Respondent Name	Comments	Council's Response
	<p>the provision of housing or greenspace. The SPD should also put forward ideas for the conversion of kerbside parking to enable more active travel on residential and high streets. This would also serve to reduce congestion and thus emissions on high streets. For instance, reallocating kerbside space from car parking for walking, cycling, green freight, better public realm, better bus stops, places to rest and for greening</p> <ul style="list-style-type: none"> • In 10.19 – 10.21 reference should be made to the use of Construction Logistics Plans and measures to reduce vehicle usage and encourage consolidation of loads, particularly for larger development sites • There should also be measures to promote greener freight delivery and collection, particularly for the first or last mile including use of cargo bikes, consolidation of deliveries and, coordination with shops and supermarkets. 	
<p>Lots Village Chelsea Association of Residents and Businesses (Martyn Baker)</p>	<p>The draft Air Quality and Climate Change Action Plan consulted on in late 2015 was underwhelming because it lacked sufficient measurable targets (see 12 point response of 6/11/15 from Lots Village).</p> <p>The publication in 2019 of an analysis showing RBKC to be the most polluted borough in London.</p> <p>The too narrowly focussed 2020 Review of the Resident Parking Permit Structure in RBKC (see our comments emailed to Antoneta Horbury on</p>	<p>The Council's Pollution Regulatory Team are working on developing a new Air Quality Action Plan which will outline air quality interventions, actions and projects that are outside of the remit of the planning system. This will include a consultation with TfL and other traffic focused actions projects besides supporting the installation of electric charging points. Residents and businesses will have the opportunity to comment and help shape the actions that will form the basis of the AQAP. Actions will include crosscutting projects that will include joined-up working between numerous Council teams and external</p>

Respondent Name	Comments	Council's Response
	<p>10/11/20). Confirmation that the Council has very few Air Quality Monitoring Stations in Chelsea, and that TfL appears to have no such stations monitoring the Earls Court One Way System (ECOWS) and has not for a number of years conducted any traffic flow surveys of its highways in Chelsea.</p> <p>Against this backdrop our key comments on this Draft SPD are as follows: -- The main Planning thrust of sections 1-10 are certainly welcome if it in time produces greener schemes through better planning applications in which the Energy Hierarchy is effectively used to inform the design, construction and operation of new buildings. But this will demand a much more rigorous and hands-on approach by the Planning Team towards implementation of planning permissions/conditions, with a clear line of command for significant individual sites to pull together all the currently disparate environmental, health and safety, and traffic management conditions. Such an approach to better greening should hopefully prevent any repetition of the gross overdevelopment of the Lots Road Power Station site in Chelsea which will have far too little green space when eventually completed. This is sadly also the case with the Chelsea Academy. We have made an NCIL application to fund a specialist consultancy to</p>	<p>stakeholders. This is discussed in section 10 of the SPD.</p> <p>The Council also has an Air Quality SPG, which will be updated later this year.</p> <p>The Council has an automatic monitoring station (KC4) located at Chelsea Old Town Hall alongside 18 NO2 Diffusion Tubes (KC4 Chelsea Old Town Hall, KC34 Dovehouse Street, KC39 Lots Road/ Uperne Road, KC43 St. Marks Grove, KC44 Donne Place, KC48 Sloane Square, KC50 Chelsea Physic Garden (Gate), KC51 Chelsea Physic Garden (Met Station), KC52 Sloane Avenue, KC55 Blantyre Street, KC56 Chelsea Old Town Hall, KC61 Fulham Road / Limerston Street, KC70 Oakley Street, KC71 Oakley Street, KC72 Oakley Street, KC73 Oakley Street, KC79 Cadogan Gardens and KC80 Pavilion Road) within the Chelsea area. The network is reviewed on an annual basis in the Council's Annual Status Report to identify any gaps or local hotspots. The Council are continually investing in this network; recent purchases include four mobile sensors and a PM2.5 monitor for KC2 Cromwell Road. Additionally, the Cambridge Environmental Research Centre (CERC) has been commissioned to undertake a boroughwide exercise to model concentrations of NO2, PM10 and PM2.5 for the years 2016, 2019 and 2022, which will help further our understanding of air pollution in the borough.</p>

Respondent Name	Comments	Council's Response
	<p>devise effective means of overcoming the deficiency in public open space in Lots Village through new green ways/spaces.</p> <p>Yet setting out more effective requirements when it comes to green issues in future planning applications will only gradually lead to greener schemes designed to deliver improved air quality, carbon reduction and biodiversity. By contrast there is surely still an URGENT NEED to reduce the excessive levels of air pollution which blighted the borough and seriously damaged the health of some residents prior to the pandemic. In sections 9 and 10 there are no very tangible signs of urgency about driving down the main causes of air pollution in RBKC, namely excessive traffic/ too frequent congestion.</p> <p>The whole of the borough is an air quality management area but there is no indication in the draft SPD that specific plans have now been drawn up by the Council, in consultation as necessary with TfL, to bear down on traffic produced pollution beyond installing more charging points in the hope that over the next few years more drivers will turn to electric cars, despite their expense, even though the recently announced increase in resident parking charges are not in themselves a big inducement. Otherwise it seems by default the Council is just pinning its hopes on the ULEZ scheme.</p>	<p>We note that reference to Air Quality Focus Areas as outline in Policy SI 1 of the New London Plan have been omitted and we will add this to para. 10.1 of section 10 of the SPD (pg. 64).</p>

Respondent Name	Comments	Council's Response
Environment Agency (Lisa Mills)	We welcome the inclusion of air quality in this DPS. Policy GG3 'Creating a healthy city' of the London Plan (draft 2019), seeks "to improve London's air quality, reduce public exposure to poor air quality and minimise inequalities in levels of exposure to air pollution". Therefore new development should prioritise energy efficiency, to minimise the contribution to greenhouse gas emissions that impact on both air quality and the urban heat island effect of London.	Support noted. The reduction of energy demand is covered in section 5 and 9 of the SPD respectively.
Archer Highways England	We have reviewed the consultation documents, and as these do not relate to highways and transport matters we have no comments to this consultation. Highways England are pleased that Kensington and Chelsea are looking at reducing carbon emissions and controlling air pollution. Therefore, we are satisfied that the outcome of this consultation will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT Circular 02/2013, particularly paragraphs 9 & 10, and MHCLG NPPF2019, particularly paragraphs 108 and 109).	Support noted.
Richard Crane	K&C's air quality is notoriously bad - immediate steps should be taken to address this. The section on air quality reads well but I see no evidence that RBKC is following it when planning new developments/buildings.	Comments noted. Once adopted the SPD will become a material planning consideration in the assessment of planning applications and therefore its requirements will apply to new developments in the Borough. It cannot be applied retrospectively, however.

Respondent Name	Comments	Council's Response
	<p>The development I refer to Q1. is within 25 meters of the Westway and mainline railway out of Paddington, an already heavily polluted area. In light of the landmark ruling in the Ella Kissi-Debrah case a little over a month after planning was granted - one has to wonder what lessons will be learned from Ella's early death?</p> <p>The proximity of the Westway and mainline railway line to the location is already a heavily polluted area. The air quality study carried out by independent consultants in support of the planning application which found the air quality was 'safe'. Having read the consultant's report, it's clear their methodology for taking a baseline assessment reading for air quality was fundamentally flawed – the readings they reference in their study are taken from locations nowhere near to the proposed site. To my knowledge, no definitive testing for air quality was carried out at or close to the site. DEFRA and Friends of The Earth have readings for the location that show the air quality to be dangerously polluted. Its essential that the correct data is referenced in any EIA/AQA reports.</p> <p>The location of the development is in the Golborne Ward, one of the poorest in London. It's been shown that London's poorest neighbourhoods are the ones most likely to suffer the effects of poor air quality.</p>	<p>The Acklam Road site was a 'Major Development' which required the submission of an Air Quality Assessment and Dust Risk Assessment (DRA) as part of the supporting evidence at the planning stage.</p> <p>The Pollution Regulatory Team was not consulted on the production of the initial two air quality reports (Stage 1 and Stage 2) produced by the consultants, which we found to be inadequate and raised our concerns over the missed opportunity.</p> <p>The Pollution Regulatory Team reviewed the Air Quality Assessment submitted with the application and advised the Planning Department that the assessment fell short on information about PM2.5. A full assessment of PM2.5 has therefore been requested as part of a planning condition. In addition to this, information has also been requested about the model uncertainty for the NO2 and PM10 modelling presented in support of the application because model performance should be evaluated in order to establish confidence in model results.</p> <p>To minimise exposure of future occupiers of the homes to poor air quality, the developers are to install ventilation to filter out harmful pollutants to the internal development and intakes must be located in areas of good air quality (demonstrated by monitoring and modelling).. There is also a commitment to ensure, the</p>

Respondent Name	Comments	Council's Response
	<p>Construction of the development will last up to 2 years. Access to the site is severely constrained, this will push pollution levels in the immediate vicinity even higher than they already are. Close to the site and that will be affected by its development, there is a primary school, two playgroups and two old people homes. This recent article from the BBC website highlights the impact of poor air quality on such groups - https://www.bbc.co.uk/news/science-environment-56013240.</p> <p>There's been much in the press recently about how deprived groups contribute least but suffer most from dirty air. The two year construction period of such a large building will make the air quality in the immediate vicinity dangerous to live, work and play in and whatsmore, could be illegal. In the case of the Acklam Road development concerns around air quality seem to have been brushed aside.</p> <p>In granting the Acklam Road site planning permission its clear the impact of the new building on local air quality during its construction and thereafter has not been properly considered.</p>	<p>ventilation plant will be maintained properly, and filters changed on a regular basis.</p> <p>The Dust Risk Assessment deemed the site to have a Medium Risk of potential dust release. The Council, in line with best practice guidance (refer to what guidance you are talking about), has requested that dust monitoring is carried out throughout the duration of the construction period. The DRA sets out the mitigation measures that will be used on site to control emissions of dust. This will include the requirement for developers / onsite contractors to notify the Council of any complaints regarding dust and the actions taken to rectify the situation.</p> <p>The IAQM guidance states 'developments that increase the AADT of 25 HGV movement would be required to assess any impacts using dispersion modelling'. Section 6 of the report provides detailed construction traffic figures, including expected speeds and AADT as used within the dispersion model. The assessment has stated that the number of HGV movements during the construction period will be less than 10 (no.) per day, which is below the EPUK screening criterion stated above and therefore requires no further assessment. We ask that this estimated number is verified against the Construction Traffic Management Plan (CTMP), which at the stage of reviewing the AQA was inadequate and contained very little relevant detail. There is no activity overview / timeline, no estimated</p>

Respondent Name	Comments	Council's Response
		<p>demolition / construction duration and no attempt to estimate the potential number of vehicle movements. It was requested that the number of HGV movements were verified against an updated CTMP and the AQA updated to reflect this.</p> <p>The Council's Code of Construction Practise (2019) sets out requirements for how construction sites are managed to reduce their impact on residents. These include requirements for construction vehicles to comply with the Low Emission Zone (LEZ) and Ultra Low Emission Zone (ULEZ) and meet European Emission Standards pursuant to the EC Directive 98/69/EC of Euro 4 for petrol vehicles and Euro 6 for diesel vehicles and Euro VI for all lorries and specialist heavy goods vehicles (see pg. 48 for example). This is in-line with the GLA's Non Road Mobile Machinery (NRMM) requirements. Plant used on construction sites in the borough is audited by Pan-London NRMM Officers who will provide assistance and / or enforcement to sites not meeting the requirements. We have alerted the NRMM Officers that the project is due to start in 2021 so the sites will be audited as a matter of priority to ensure that NRMM on site is compliant.</p>
DP9 (Dan Fyall)	The promotion of the provision of electric vehicle charging points within developments is welcomed in principle as a means of encouraging active and sustainable travel. It is however noted that the stated RBKC requirement for at least 40% of on-site parking	<p>Noted.</p> <p>However, we will seek higher standards from sites such as Earl's Court. Given their strategic and long-term nature there is a need for development to be future</p>

Respondent Name	Comments	Council's Response
	<p>spaces to have active electric charging points while is referred to in the Transport and Streets SPD, is not written into adopted RBKC policy. As noted this exceeds the NLP minimum 20% active requirement and without an adopted local policy position to support the 40% requirement, we request that at minimum paragraph 10.16 be amended to acknowledge that a lower active provision may be acceptable on strategic developments which are referable to the Mayor, in line with NLP policy (i.e. 20%+). Where charging measures are required, in particular we advocate the approach at paragraph 10.18 of incorporating them into other street furniture items like light columns as much as possible so as to reduce street clutter.</p>	<p>proof. Schemes of the scale such as Earl's Court will need to consider a wide range of policies and possibly have exemplary standards, including the target of providing 100% on-site parking spaces with EV charging points, which we plan to bring into policy in the New Local Plan. However, such issues will be dealt with on a site-specific basis rather than the SPD outlining limitations. The planning system allows for flexibility.</p>
<p>RBKC (Charles O'Connor)</p>	<p>Far too little reference to the value of trees in maintaining air quality</p>	<p>Comments noted.</p> <p>We agree that trees make an important contribution to greening the borough. As noted in section 11 of the SPD, the Council has committed to planting additional trees where possible and the Borough is already home to over 8,000 street trees. This aim is supported by Policy CR6 of the current Local Plan, which states the Council will require the protection of existing trees and provision of new trees.</p> <p>We will look to expand the guidance on trees in section 11 and 13 of the SPD.</p>

Respondent Name	Comments	Council's Response
		<p>In addition, the Council's Arboriculture Department has committed to updating the Council's Tree Strategy and Trees and Development SPD. Several of the references to British Standards and Council Documents in the Trees and Development SPD are out of date and this will be rectified.</p> <p>Similarly, the Tree Strategy needs an update. It is anticipated that both revised documents will be ready for adoption in 2022.</p>
Cornwall Mews South (West Side) RA (Philippa Jill Manasseh)	Our air is dreadful anything to improve it would actually save lives.	<p>Noted.</p> <p>The Council's Pollution Regulatory Team are working on developing a new Air Quality Action Plan which will outline air quality interventions, actions and projects that are outside of the remit of the planning system. This will include a consultation with TfL and other traffic focused actions projects besides supporting the installation of electric charging points. Residents and businesses will have the opportunity to comment and help shape the actions that will form the basis of the AQAP. Actions will include crosscutting projects that will include joined-up working between numerous Council teams and external stakeholders. This is discussed in section 10 of the SPD. The Council also has an Air Quality SPG, which will be updated later this year.</p>
V Rowlands	This section should put more emphasis on facilitating and encouraging active travel. Electric vehicles are	Comments noted.

Respondent Name	Comments	Council's Response
	<p>fine, but ultimately we need to remove vehicles from our roads to reduce congestion and pollution and encourage healthy lifestyles. Electric vehicles are cleaner than petrol/diesel, but they are still polluting and not free of emissions/pollutants. They run on batteries which need to be recycled. They are heavier and therefore release increased particles from their tyres. If everyone gets an electric vehicle instead of a petrol/diesel car, a charging point every 200m will not be anywhere near sufficient and we will introduce a new type of congestion into our streets - the queue to charge our cars. We are not future proofing ourselves or our streets by only encouraging electric vehicles. We should be trying to reduce the number of all types of cars on our roads, and introduce more support for walking and cycling where possible, improving cycle / pedestrian infrastructure in order to do so. We need to increase safe road crossings, and we need proper safe and segregated cycle lanes. In particular we need an east/west cycle lane through the borough (ideally on High Street Kensington), instead of simply focusing on expanding the network of quietways which are not direct routes and not appropriate for commuting or quick journeys.</p>	<p>As outlined in section 10 of the SPD, Policy CT1 of the current Local Plan requires that walking, cycling and public transport are safe, easy, attractive and inclusive for all. We therefore require development proposals to seek to support sustainable and active transport options and minimise any increase in traffic congestion or on street parking pressure.</p> <p>It is important to note that the issue of air quality is a larger problem that planning alone cannot solve. The Pollution Regulatory Team are working on developing a new Air Quality Action Plan, which will outline how the Council plans to address the Borough's air quality and will include a range of strategies and interventions that are outside of the remit of the planning system. This is discussed in section 10 of the SPD.</p>
Ms Sarkis	<p>Front gardens and rear gardens should not be built over or paved over. Guidance about proportion of garden paved over would be welcome.</p>	<p>The retention of front and rear gardens is key for the borough both as they provide natural drainage and biodiversity. The Local Plan policy CE2i already refers</p>

Respondent Name	Comments	Council's Response
		<p>to the provision of permeable surfaces not only in front gardens but all landscaped areas.</p> <p>A section explaining the importance of gardens, their benefits and maintenance will be included in chapter 11, after the streetscape greening. We will also refer to the need of providing permeable surfaces in landscaped areas to be in line with policy CE2i.</p>
	<p>Air quality has reduced drastically in the last 20 years. Carbon dioxide in evidenced levels have shot up in what was a green area. I think RBKC should pay more attention to preserving existing green areas and not allowing them to be overrun by pollution - this is the case in our area before spending on new buildings.</p>	<p>Comment noted.</p> <p>The Council protects existing green and open spaces in the Borough through Policy CR5 of the current Local Plan. The Greening SPD is intended to supplement the Local Plan, rather than tacking its place or repeating policy.</p> <p>It is important to note that the issue of air quality is a larger problem that planning alone cannot solve. The Pollution Regulatory Team are working on developing a new Air Quality Action Plan, which will outline how the Council plans to address the Borough's air quality and will include a range of strategies and interventions that are outside of the remit of the planning system. This is discussed in section 10 of the SPD.</p>
Kensington Society (Sophia Lambert)	<p>Section 10: Air quality</p> <p>CO2 is the major cause of global warming, but major</p>	<p>Comments noted.</p> <p>The SPD is not intended to be an exhaustive list of all standards and interventions that the Council will support</p>

Respondent Name	Comments	Council's Response
	<p>pollutants such as NOx emissions are detrimental to health, exacerbating asthma for example, rather than contributing to global warming. NOx is found in its highest concentration at the roadside. We should not have to choose between reducing global warming or improving health. Both should be considered in the report.</p> <p>This section ought also to address the “plan making” considerations which is so well thought out in NICE (National Institute for Health and Care Excellence) 30 June 2017, for instance as regards siting developments for school and housing away from polluting locations such as motorways, heavily trafficked road and rail lines. https://www.nice.org.uk/guidance/NG70</p> <p>Para 10.11 says: “Developments are expected to minimise increased exposure to existing poor air quality and make provision to address local air quality and promote greater use of sustainable transport modes through travel plans. Proposals will be required to promote sustainable design and construction methods, to reduce the emissions produced from the demolition and construction phases following the best practice guidance listed above.” It needs to be clarified what guidance is meant.</p> <p>Para 10.24: Green walls are both very thirsty for</p>	<p>but rather a document that sets guiding principles for development in the borough. The Council's Pollution Regulatory Team are working on developing a new Air Quality Action Plan which will outline air quality interventions, actions and projects that are outside of the remit of the planning system and this SPD. Residents and businesses will have the opportunity to comment and help shape the actions that will form the basis of the AQAP. Actions will include crosscutting projects that will include joined-up working between numerous Council teams and external stakeholders. This is discussed in section 10 of the SPD. The Council also has an Air Quality SPG, which will be updated later this year.</p> <p>Regarding para. 10.11, this is a mistake and should refer to best practise guidance listed below rather than above. This will be correct.</p> <p>Agreed. Paragraph 11.21 will be expanded to refer to the likely need for watering and lighting green walls and how these needs vary with the seasons. We will explain that light pollution should be considered when developing the maintenance plan.</p> <p>Section 10 of the SPD states that the Council encourages all development to support and facilitate sustainable transport, this includes public transport such as trains and buses which are a key method of travel for</p>

Respondent Name	Comments	Council's Response
	<p>water, but in winter months require lighting. There should be some warning about the extent of maintenance, the requirement for managed watering, proper lighting which is not a pollutant at night. They are lovely but not an acceptable alternative to open spaces.</p> <p>Given the age profile of the RBKC residents, who cannot all cycle, there needs to be more emphasis on how the less mobile get around.</p>	<p>less mobile residents who are unable to cycle for instance.</p>
<p>Cadogan Estates Limited (Jane Henshaw)</p>	<ul style="list-style-type: none"> • We support these proposed requirements. • Cadogan is continuing to deliver against our air quality strategy, with 3 principle objectives: <ul style="list-style-type: none"> a) reducing vehicles on the road (by promoting offsite construction and logistics consolidation), b) encouraging remaining vehicles to be zero emissions (through e-cargo bike facilitation and supporting EV transition), and c) supporting transition to EVs with appropriate infrastructure. 	<p>Support noted.</p>
<p>Earl's Court Area Action Group (Bella Hardwick)</p>	<p>Earl's Court has the worst air quality in the UK as reported in The Guardian and the Daily Express. The Earls Court Masterplan site, of which 22 acres is in RBKC, is currently a wasteland. We call on the Council to include significant greening of empty development land (whatever the size) before works start as mandatory. It is a scandal that so much land in Earl's Court at a time of climate emergency has</p>	<p>Comments noted.</p> <p>The Greening SPD is intended to establish principles to guide development across the borough rather than set out detailed guidance and requirement for specific sites. Site specific issues linked to Earl's Court are beyond the scope of this SPD and will be dealt with on a site-specific basis.</p>

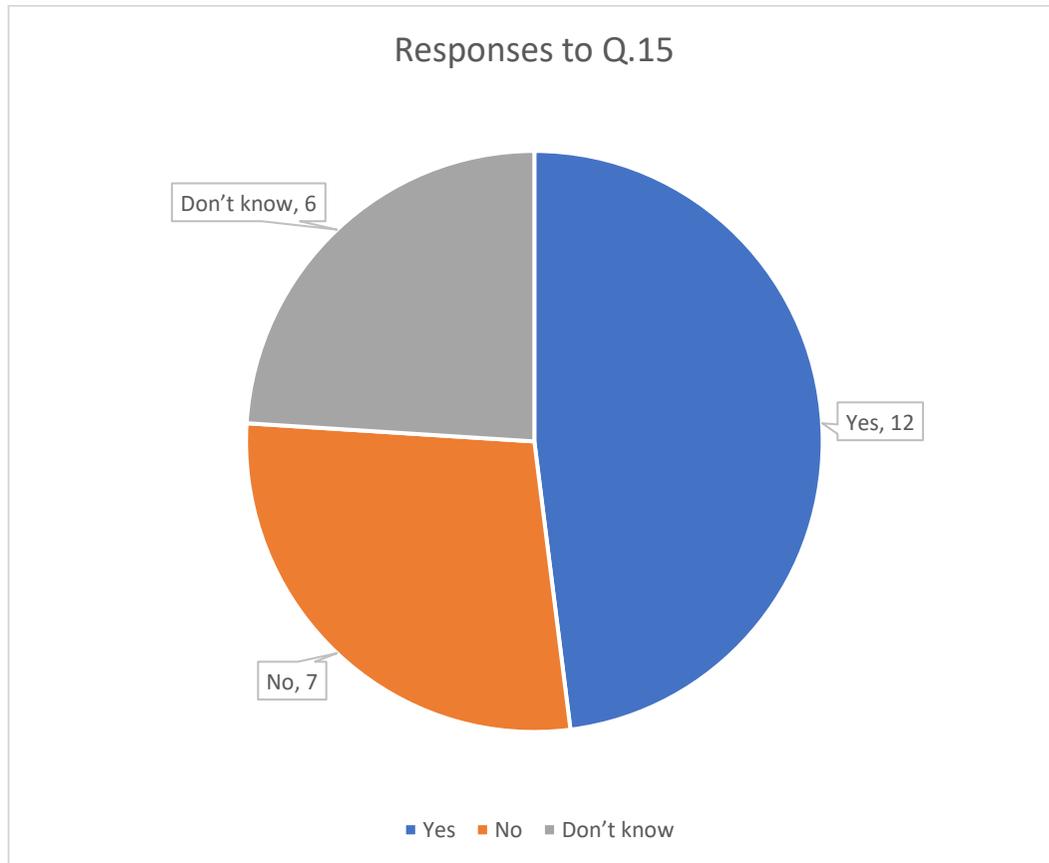
Respondent Name	Comments	Council's Response
	<p>been empty of any greenery for over 3 years. The Council should act now to ensure that this situation in Earl's Court is resolved.</p> <p>Significant greenery should also be mandatory in meanwhile use sites and meanwhile gardens should be encouraged.</p> <p>https://www.theguardian.com/environment/2019/feb/27/pollution-map-reveals-unsafe-air-quality-at-almost-2000-uk-sites</p> <p>https://www.express.co.uk/news/uk/1111938/most-polluted-road-uk-earls-court-road-west-london-ulez-sadiq-khan</p>	
<p>CAMELLIA Research Project Imperial College London (Ana Mijic Pepe Puchol-Salort)</p>	<p>The AQA seems a good way of assessing the intentions from developers before building a new urban development; however, a more citizen-focused approach might also be interesting (with local campaigns to promote active travel, public transport, etc.). Post-covid situation might also change the perspective in this matter as more people will work from home, etc...</p>	<p>Comments noted.</p> <p>The SPD has been produced in conformance with the policies and requirements set out in the New London Plan. The Council is required to do this under current planning legislation, we cannot set targets or requirements that are contrary to those set by New London Plan in an SPD.</p> <p>It is important to note that the issue of air quality is a larger problem that planning alone cannot solve. The Pollution Regulatory Team are working on developing a new Air Quality Action Plan, which will outline how the Council plans to address the Borough's air quality and will include a range of strategies and interventions that</p>

Respondent Name	Comments	Council's Response
		are outside of the remit of the planning system. This is discussed in section 10 of the SPD.
Labour Group of Councillors (Mohammed Bakhtiar)	<p>The Labour Group of Councillors called for a declaration of Climate Change Emergency in October 2019, which was endorsed by the RBKC council.</p> <p>The RBKC is one of the worst polluted boroughs in London and the country and North Kensington is particularly badly affected. For instance; Living near the Westway can take 10 years off your life, therefore and as a result, quick and special measures are needed to rectify this problem, such as identifying sites for installing industrial air purifying systems and carbon capture units/storages.</p> <p>All new major developments must have industrial air purifying systems considered when submitting a planning application. The council through its housing management team needs to explore the possibility of supplying its tenants with household air purifying units and arrange for their regular service as an on-spot remedy for the most polluted parts of the borough. Other housing providers need to be encouraged to follow the lead, while looking into other ways of cleansing the air on an industrial scale through carbon capture and carbon dioxide removal technology which have been used in over 50 countries around the world, and still expanding.</p> <p>The housing management department at the council</p>	<p>Noted.</p> <p>As part of the planning process Major Developments are required to submit an Air Quality Assessment which identifies if the development will introduce receptors into an area of poor air quality. If it is identified that receptors are to be exposed to poor air quality developers are required to provide suitable ventilation to filter out harmful pollutants to the internal development, which is secured by the Council through a planning condition. Within this condition it is stated that the ventilation plant is maintained properly, and filters changed on a regular basis.</p> <p>The Greening SPD sets out the principles to guide green development across the Borough. These requirements will apply to Council owned development in the same way as they would do to any other development.</p>

Respondent Name	Comments	Council's Response
	<p>and all other housing providers in the borough should consider installing solar panels on their buildings when and wherever possible and viable, especially on towers and high rising blocks. For instance; Block B at Trellick Tower is a potential site for a solar panel use.</p> <p>Any future council owned developments must consider, in line with Government Guidance, installing alternative methods instead of gas boilers, as at 50 Verity Close, in keeping with our commitment to build a circular sustainable economy to enable us to reach our Carbon Neutral Goals.</p>	

Section 11: Urban Greening

Q15: Is the information regarding how to meet the urban greening factor included under paragraphs 11.7 and 11.26 clear?



If not, can you please explain how we can improve it?

Respondent Name	Comments	Council's Response
Jane Whewell	<p>While we are keen to see additional greening of the Borough, we would ask that the drafting of this section of the document be amended to make sure that the text cannot be exploited to provide justification for roof gardens in unsuitable spaces. There is significant developer pressure for the creation of roof gardens where they would cause significant harm through overlooking to immediate neighbours. It should be made clear that the endorsement of additional plants and greening through development in no way provides justification for the creation of rooftop terraces and gardens that would cause harm to neighbours through overlooking and infringe on privacy. At present we consider the text could be misused during planning hearings to provide justification for installation of rooftop terraces and gardens that currently would not be permitted due to the harm they would cause to neighbours. We would of course have no objection to green roofs and other similar installations that do not infringe on privacy or create overlooking.</p>	<p>Under paragraph 11.18 (green/blue roof considerations) we refer to considering accessibility and the historic environment (amongst other issues) but we have not added a explicit reference to amenity or overlooking.</p> <p>Agreed. We will add amenity and overlooking issues as considerations for green/blue roofs (paragraph 11.17). Local Plan policies will still apply.</p>
Michal Levin	<p>Suggest planting of trees along bus routes wherever possible- and believe it would be possible on my street, Elgin Crescent W11 2 JD</p>	<p>Suggestions noted.</p> <p>We agree that trees make an important contribution to greening the borough. As noted in section 11 of the SPD, the Council has committed to planting additional trees where possible and the Borough is already home to over 8,000 street trees. This aim is supported by</p>

Respondent Name	Comments	Council's Response
		<p>Policy CR6 of the current Local Plan, which states the Council will require the protection of existing trees and provision of new trees.</p> <p>Unfortunately, not all bus routes are able to accommodate trees planted along them. It is not possible to plant trees in the street on the stretch of Elgin Crescent between Portobello and Ladbroke Grove as they are utility cable runs adjacent to the kerb on the South side. There are a number of existing trees growing in the footpath on the North side and lots of trees on the section to the West of Ladbroke Grove.</p>
<p>Ladbroke Association (Sophia Lambert)</p>	<p>No time to think up a redraft but would be happy to discuss this further with the Council. We have the following comments on this section.</p> <p>The document is eloquent on the benefits of providing green spaces as part of new developments. But we are disappointed that this chapter has so little to say about the importance of existing private gardens. Although individual private gardens are mostly small, together they must add up to a substantial part of the land area in the borough. The 2007 BUGS project, which surveyed 61 domestic gardens in Sheffield, concluded that private gardens, taken together, might reasonably be described as the UK's most important nature reserve.</p> <p>However, to maximise the benefits of private gardens</p>	<p>Agreed. The importance of existing front and rear gardens is key as they provide natural drainage and biodiversity. The Local Plan policy CE2i already refers to the provision of permeable surfaces not only in gardens but all landscaped areas.</p> <p>A section explaining the importance of gardens, their benefits and maintenance will be included in chapter 11, after the streetscape greening.</p> <p>We will also refer to the permeable surfaces requirements in landscaped areas to be in line with policy CE2i. It is not permitted development to have impermeable paving in front gardens that are more than 5 sq.m.</p> <p>We will look for guidance on planting to refer to in the SPD although we should note that the type of</p>

Respondent Name	Comments	Council's Response
	<p>in terms of sustainable drainage; localised cooling; biodiversity (including urban bees); and wellbeing, they need to be properly managed and we would like this document to say more about that – in words that are easily accessible for householders.</p> <p>We are in particular concerned about the increasing fashion for paving over large areas of both front and back gardens, often with the sort of closely set Portland stone paving more suitable to the plazas of institutions and grand hotels. Even when permeability is required, as in front gardens, this seems often to be achieved through narrow beds or drainage channels round the edge of the paved area. We have also noticed an increasing use of astro-turf or similar fake lawn material. Some of these materials are permeable, but not all. In back gardens, decking remains popular.</p> <p>There is a limit on what people can be required to do in their private gardens. But we think that, at the very least, the existing planning controls for paving should be extended to cover back gardens.</p> <p>We also think that there is more that can be done by way of advice and “nudges” to encourage people to maximise planting; to go for more truly permeable sorts of surface such as pebbles, gravel, hoggin or crazy paving; and to make use of grey water for watering. Advice on types of planting could point out</p>	<p>plants used cannot generally be controlled by Planning.</p>

Respondent Name	Comments	Council's Response
	<p>that longer-lived woody and herbaceous plants can provide greater carbon sequestration than annual plants due to reduced tillage and storage in biomass. Flowering plants and trees are better for insects, including bees (and urban bee-keeping is becoming a popular hobby).</p> <p>HEDGES. We welcome the stress in the document on the benefits of hedges. But it needs to be made clearer that this applies to existing private gardens as well as new developments. The Ladbrooke Conservation area has long been characterised by its open aspect with its green front gardens visible from the street and its rear gardens abutting communal gardens forming linked green spaces. We are concerned, therefore, at the increasing tendency for people to shut themselves in with walls and solid wooden fencing, thus depriving the community of a public benefit. Hedges, or trellis with climbing plants, can provide privacy while at the same time bringing the benefits outlined in the draft SPD – so again a win-win situation. We believe the planning system should be used to encourage green barriers rather than brick or wooden ones wherever possible (we are fortunate in our area to have a large number of Article 4 directions removing permitted development rights in respect of walls and fences).</p>	

Respondent Name	Comments	Council's Response
		<p>We note the support for hedges. The reference to hedges in paragraph 11.2 is about their benefits regardless of if they are existing or as part of new development.</p>
<p>London Wildlife Trust (Mathew Frith)</p>	<p>It can be confusing on the role/purpose of the UGF in respect of biodiversity. Scoring proposals for UGF vs BNG can give differing outcomes. There should be clarity that their purposes are different, although there are overlaps. We (London Wildlife Trust) have produced guidance with the GLA on how UGF can be utilised to help maximise benefit for biodiversity. BNG is easier to achieve in lower denser neighbourhoods. Current BNG guidance aims for a 10% uplift, but development on sites of zero biodiversity value (which does happen in the inner city), this equates to 0%, hence the need to apply UGF with nuance if possible.</p> <p>Something which could be further expanded on is referencing trees (11.28), assessing the value of trees (eg CAVAT value) that might be affected by new development and how that should be addressed, through avoid, reduce, mitigate, offset, compensate</p>	<p>We agreed that there may be some confusion between the UGF and BNG. However, if green infrastructure is designed with biodiversity in mind, it can meet both, the UGF and BNG.</p> <p>We will refer to the guidance in the SPD.</p> <p>Noted and agreed. A reference to include trees when considering the mitigation hierarchy in paragraph 13.14 will be added.</p>

Respondent Name	Comments	Council's Response
	<p>hierarchy. Reference to the Borough's Tree Strategy points on trees and development should be incorporated.</p>	
<p>Canal & River Trust London (Claire McLean)</p>	<p>Page 72 - 11. Urban Greening</p> <p>We support the approaches mentioned (biodiversity net gain, streetscape greening, green walls) in new developments. Where developments are next the canal, these should also extend to canalside greening interventions, to increase habitat and biodiversity, including aquatic ecosystems where considered appropriate by the Canal & River Trust (once navigation concerns, etc have been assessed).</p>	<p>Support noted.</p> <p>A paragraph will be added after 11.3 to refer to the importance of considering the setting of the development and opportunities given by existing infrastructure (parks, canals, etc). We will explain that where developments are next the canal, canalside greening interventions may have a positive impact in increasing habitat and biodiversity, including aquatic ecosystems.</p>
<p>Kerry Davis-Head</p>	<p>REGARDING URBAN GREENING</p> <p>Ensure that developments who had planning conditions imposed regarding planting, maintain such planting and don't remove it. Examples can be given, notably where they needed more space as the site was too small.</p> <p>Look after existing assets and do not let them slide. Check that removed trees are replaced and certainly within the growing season, check that shrubs are maintained, if wild areas are grown then ensure they are cut at the correct time etc etc.</p> <p>Several trees have been lost in back gardens; it is understandable that these sometimes become too large for the urban environment but sometimes they</p>	<p>Suggestions noted. The SPD refers to the importance of trees in paragraphs 11.28 and 11.29.</p> <p>A section explaining the importance of gardens, their benefits and maintenance will be included in chapter 11, after the streetscape greening.</p> <p>We will also refer to permeable surfaces requirements in landscaped areas to be in line with policy CE2i.</p> <p>We will look for guidance on planting to refer to in the SPD although we should note that the type of</p>

Respondent Name	Comments	Council's Response
	<p>are 'just a nuisance'. Perhaps utilise the fee for applying to cut down a tree for planting a new street tree or park tree. Monitor sites closely to prevent loss of trees 'by accident', once lost they are lost to wildlife as even if replaced, they cannot possibly host the insects and birds the original maintained.</p> <p>Look to every street and see if another tree can be planted. Look to every blank wall and see if a climber or wall shrub could be planted. Green walls are expensive but see if this is the only viable alternative and allocated funds for maintenance. Look at associations such as the Royal Horticultural Society for reports and papers, see their latest findings re a type of Cotoneaster. Look to see maybe if these could be ordered wholesale and offered to residents to plant at reduced cost, every little helps. Look to see if Housing Associations seemingly 'Scorched Earth" policy can be changed, the raising to the ground of front facing gardens has removed much habitat and pollution busting greenery.</p> <p>Can you encourage them and engage with them? Little pockets of green not only help pollution and ecology but lift the spirits of all passers-by.</p>	<p>plants used cannot generally be controlled by Planning.</p>
<p>Milner Street Area Residents' Association (Richard Grantley)</p>	<p>We are generally in favour of urban greening in the form of ground level landscaping, green walls and semi-natural vegetation and wetlands.</p> <p>17. Any new "green landscaping" should be subject</p>	<p>Support noted.</p>

Respondent Name	Comments	Council's Response
	<p>to the approval of local residents, whose idea of what constitutes attractive landscape design may well differ from those of planning officers. Such landscaping should not be imposed against their will.</p> <p>18. However, the Council should be careful that allowing "green roofs" does not give a loophole enabling roof terraces that would not otherwise be allowed under existing planning rules. The minor "green" benefit of an individual roof terrace could easily be outweighed by visual pollution (clutter), noise pollution and overlooking of neighbours, all of which can be good reasons for rejection, and should remain so.</p>	<p>Residents will be able to comment on the green infrastructure of a proposal as part of the planning application process.</p> <p>Noted and agreed. We will add a new section to cover amenity and overlooking issues when considering green/blue roofs (paragraph 11.17).</p>
Luisa Cicognani	<p>It has to be clear that NO building permission will be granted which reduces green spaces and gardens. we cannot have more cement in central london</p>	<p>Noted. Although we agree, the SPD cannot set new policy. It provides guidance to implement existing policies in the Local Plan and the London Plan.</p>
G Thomson	<p>ECDC agrees that it will be necessary for outline applications to demonstrate compliance as part of reserved matters. This is an important point for the SPD to recognise as the level of detail required to satisfy the policy will not be available at outline stage. There should be flexibility for phased schemes to consider UGF on a phased basis or holistically on the basis that mitigation may be concentrated in a particular part of the site.</p> <p>The SPD should also recognise the interplay between urban greening and biodiversity net gain</p>	<p>The incorporation of green infrastructure should be considered at outline planning application stage. Retrofitting green infrastructure into an already designed scheme results in a poorer green infrastructure provision.</p> <p>An UGF analysis should be given at outline stage and provide a more detailed UGF analysis at reserved matters stage. This is already considered within para. 11.15 and will be added into the table in chapter 11.</p>

Respondent Name	Comments	Council's Response
	<p>creation and the need to balance the two calculations, especially on constrained sites. The creation of new habitats and urban greening can require significant land take, which will need to be balanced with the need for land to deliver e.g. new homes, employment floorspace and community facilities.</p> <p>The SPD should recognise these competing pressures within such a heavily constrained borough and the need to take site constraints into account, and support a flexible approach to achieving these objectives. ECDC requests that the SPD acknowledges these challenges and allows such areas to be excluded from the calculations. Appropriate scoping of the assessments is recommended, recognising that areas which do not afford intervention (i.e. railway lines) can reasonably be</p>	<p>Comment noted. If green infrastructure is designed with biodiversity in mind, it will be of higher quality.</p> <p>Site constraints will be considered for each planning application on a case by case basis. They are referred to in paragraph 11.26.</p> <p>Noted.</p>
TfL Planning, Transport for London (Richard Carr)	<p>Chapter 11 – Urban Greening</p> <ul style="list-style-type: none"> Streetscape greening – The borough is rightly proud of its tree cover and this is an important feature of many streets. However, it would be useful to state that places and spaces around old mature trees on footways need to provide the conditions for trees to thrive as well as enough space for all people to move around safely including people with visual impairments or to cater for buggies or wheelchair users 	<p>Noted.</p> <p>Unfortunately, there is limited width on a pavement so by definition if the tree gets bigger, as it inevitably will, there will therefore be less space for people, buggies and wheelchairs etc. There may be very rare cases where the pavement could be extended into the carriageway, but this is very unlikely. The only alternative would be to fell the tree to create more space on the pavement.</p>

Respondent Name	Comments	Council's Response
Environment Agency (Lisa Mills)	We welcome the inclusion of urban greening within this SPD. Often SuDs can be designed and implemented in ways that promote multiple benefits including urban greening, as well as increased water use efficiency, improved water quality, and enhanced biodiversity and contributing to biodiversity net gain, amenity space and recreation. However, it should be noted the SuDs should be used with caution if there is previous land contamination on site, or if the proposed development has the potential be contaminative, in the interests of groundwater protection. Infiltrating water has the potential to cause mobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of underlying groundwater resources.	Noted. Reference to the multiple benefits of SuDS is included in chapter 12. Land contamination issues are addressed at planning application but will also be included in paragraph 12.14 when referring to the site constraints to address when designing SuDS.
RBKC (Charles O'Connor)	Quite. Remains to be seen whether this metric is helpful in practice.	Noted.
Cornwall Mews South (West Side) RA (Philippa Jill Manasseh)	Use simple language, perhaps you should state what an individual could do.	Noted.
Ms Sarkis	Green corridors should be mandatory as they are cheap and easy to implement. More explanation eg from RSPB https://www.rspb.org.uk/get-involved/activities/give-nature-a-home-in-your-garden/garden-activities/createnaturehighwaysandbyways/	Noted. We support the information and comments provided about corridors, trees and hedges which are referenced in the SPD. Thank you for the links to the documents which we will add in chapter 11 and 13.

Respondent Name	Comments	Council's Response
	<p>Many of our garden creatures need to move about freely between gardens. Did you know that hedgehogs need to walk a mile or more in a night looking for food and a mate? Sadly, our gardens are too often little high-sided boxes. You can help by creating safe corridors from your garden to the one next door.</p> <p>This is a great activity to do with your neighbours to connect your gardens.</p> <p>You can create highways and byways whenever you like, but it is usually easiest in winter when there are fewer leaves on the trees and shrubs.</p> <p>Plant trees and shrubs. Corridors can be high up as well as under things. A line of trees or shrubs can act as stepping stones, and a good mix of both provides cover and allows wildlife to move along the floor. Even better, turn a fence into a hedge. Hedges are the most wildlife-friendly garden boundaries. They are safe corridors, can be full of seeds and berries, and are also used for nesting. Add a climbing plant. If you have bare fences or garden walls, adding a climber will act like a ladder for some creatures.</p> <p>Green areas are often threatened by expanding city structures, which have fragmented natural areas,</p>	<p>https://www.rspb.org.uk/get-involved/activities/give-nature-a-home-in-your-garden/garden-activities/createnaturehighwaysandbyways/</p> <p>https://climate-adapt.eea.europa.eu/metadata/adaptation-options/green-spaces-and-corridors-in-urban-areas</p>

Respondent Name	Comments	Council's Response
	<p>creating small patches of green spaces in amongst buildings and roads. For example, patches of urban woodlands are generally separated from each other, which affects the ability of many woodland species to disperse, or move among different locations with similar habitats. Ecological corridors or connections between urban woodlands, gardens or other green spaces are recognised as a way to limit the negative effects of fragmentation. The creation of green areas and corridors can be applicable in most urban areas. The wide array of available techniques allows application in areas with very different characteristics and even where space is limited. Techniques include, for example, green roofs and walls which use vegetation on the roofs and facades of buildings to provide cooling in summer and thermal insulation in winter.</p> <p>https://climate-adapt.eea.europa.eu/metadata/adaptation-options/green-spaces-and-corridors-in-urban-areas</p>	
	<p>Supply all properties with front gardens as one off supply of "Conteauster thanketi" plants that will reduce emissions than other hedges.</p>	
<p>Kensington Society (Sophia Lambert)</p>	<p>Section 11 Urban Greening We feel very strongly that UGF principles should be applied to all developments, including small-scale ones. In particular, more attention needs to be paid to</p>	<p>Support for UGF noted. However, the SPD cannot create new policy. This will be considered in the development of the new Local Plan.</p>

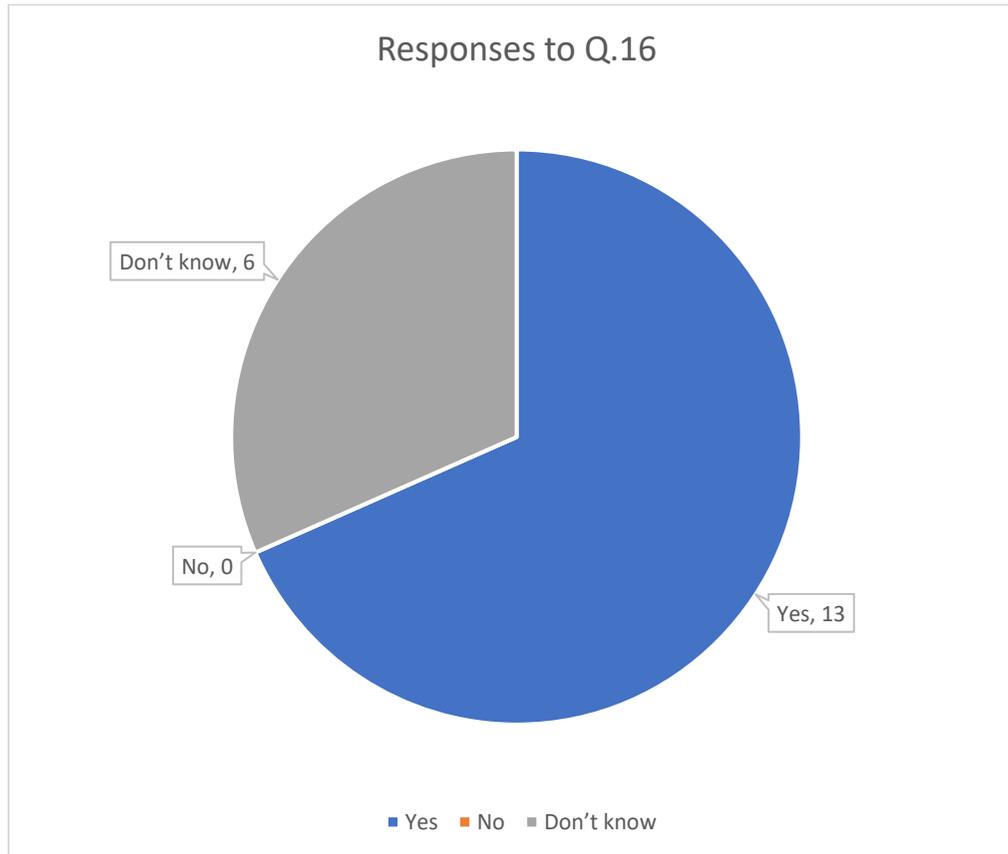
Respondent Name	Comments	Council's Response
	the role of private gardens, which taken together make up a very considerable percentage of the area of the borough.	<p>The retention of front and rear gardens is key for the borough both as they provide natural drainage and biodiversity.</p> <p>A section explaining the importance of gardens, their benefits and maintenance will be included in chapter 11, after the streetscape greening.</p>
St Helen's Residents Group (Jenny Harborne)	UGF scores are unnecessarily confusing Can you aim to link up all green spaces so that wildlife can travel and not be confined to small islands? le focus on network rather than patches.	The UGF scores are set by the London Plan. Reference to corridors and hedges are already included in the SPD.
Cadogan Estates Limited (Jane Henshaw)	<ul style="list-style-type: none"> • UGF is very challenging on existing urban developments. For example, Cadogan has an Estate-wide UGF of 0.18, including all our gardens and green spaces. We are committed to increasing the quality and quantity of our green spaces and are targeting an ambitious 25% increase in the Estate's UGF over 10 years. This still will not achieve 0.3 however, so it is difficult to see how this can be a realistic, achievable target. • Living walls are unlikely to be considered acceptable on heritage assets and there is a concern over fire safety regulations; further understanding of how this his is to be approached would be appreciated. 	<p>Comment noted. It is very interesting to have information about the existing UGF baseline and future projection for the Cadogan Estates. Thank you for sharing it.</p> <p>Noted. Further reference to acceptability of green walls in heritage terms will be added to paragraph 11.20.</p> <p>Noted. The UGF score for major development is set by the London Plan. When we develop the local UGF we</p>

Respondent Name	Comments	Council's Response
	<ul style="list-style-type: none"> Given the restrictive nature of the borough in terms of development and greening potential, we suggest a more flexible approach to the Urban Greening Factor but focusing on net biodiversity gain as an alternative. It is suggested that RBKC consider greening based on area or ward rather than an individual building, where opportunities might be extremely limited. 	<p>will consider the Borough's constraints and opportunities.</p> <p>The UGF is a measure of the greening provided by a development site rather than an area or a ward.</p>
Earl's Court Area Action Group (Bella Hardwick)	<p>With regards to biodiversity, in paragraph 11.27 it says: "UGF refers to the final level of greenery onsite and although, the better the quality, the higher the score, there is no requirement for a biodiversity measurement." Why is there no requirement for a biodiversity measurement?</p> <p>How would the Council react to new discoveries such as this "super plant" in a timely manner?</p> <p>https://www.theguardian.com/environment/2021/feb/18/experts-identify-super-plant-that-absorbs-roadside-air-pollution</p> <p>Illustrations of plants in pots etc on development hoardings boasting of green credentials and sustainability can be misleading. How will the Council deal with this?</p>	<p>The UGF does not include a explicit score for biodiversity, although more mature and better quality green infrastructure (which will favour biodiversity) has a higher score.</p> <p>New discoveries and links to Biodiversity Net Gain will be considered in due process either through further guidance or new policy development.</p> <p>The Council have some control over hoardings but not necessarily over what is displayed in the hoarding in terms of credentials. However, the construction sites will be monitored as part of the code of construction practice. Please visit the Council website for further information:</p> <p>https://www.rbkc.gov.uk/environment/code-construction-practice</p>
CAMELLIA Research Project	It is not clearly exposed if the UGF requirement will be compulsory or if it will be only "encouraged"	UGF will be compulsory for major development as it is part of the adopted London Plan. For minor development

Respondent Name	Comments	Council's Response
Imperial College London (Ana Mijic Pepe Puchol-Salort)	<p>(11.7). Additionally, it would be helpful to provide some extra examples of BGI (Blue Green Infrastructure) solutions that can be installed in different types of buildings (existing or new). As an overall, the section is very relevant and should be taken into serious consideration (perhaps consider the term of “ecosystem services” and “urban natural capital” as benefits obtained from all these BGI solutions, see paper: Puchol-Salort, P. et al. (2021). An urban planning sustainability framework: Systems approach to blue green urban design. Sustainable Cities and Society 66: 102677)</p>	<p>the Council will encourage to consider the UGF. The Mayor of London is working to produce specific guidance on the UGF. We do not wish to add further terms as we want to keep the guidance as user-friendly as possible. Articles noted.</p>
Labour Group of Councillors (Mohammed Bakhtiar)	<p>The Labour Group of Councillors called for a declaration of Climate Change Emergency in October 2019, which was endorsed by the RBKC council.</p>	<p>Noted.</p>

Section 12: Minimising Flood Risk

Q16: Section 12 of the SPD includes information regarding when flood risk assessments are required and flood risk measures. Is this information clear?



If not, can you please explain how we can improve it?

Respondent Name	Comments	Council's Response
Canal & River Trust London (Claire McLean)	<p>Page 86 – Minimising flood risk</p> <p>The canal can accept surface water drainage from adjacent developments, subject to assessment by the Trusts Utilities team, and a commercial licence. We are pleased to note the reference to the Canal & River Trust as a relevant interested party on page 99.</p>	<p>Comment noted. Surface water discharge should be addressed as part of the Integrated Water Management Strategies required for major developments as explained in chapter 12 (page 88 under Our requirements Water Infrastructure).</p>
KRACR (Chris Lenon)	<p>This is not a comment of disagreement, but it is difficult to see where to fit it. A way of reducing flood risk, as described, is the use of grey water in domestic and commercial premises rather than as flow away. Approval of such use should be considered as a means of reducing flood risk.</p>	<p>Comment noted and agreed. A way of reducing pressure in the local sewers (which can lead to sewer flooding when the sewer backs up) is by reusing water before it is discharged into the sewer system. Rainwater harvesting and greywater separation should be considered as part of Integrated Water Management Strategies required for major developments as explained in chapter 12 (page 88 under Our requirements Water Infrastructure).</p>
Environment Agency (Lisa Mills)	<p>We welcome the inclusion of Flood Risk in this SPD. We have included further advice below for your consideration:</p> <p>Climate change and flood risk</p> <p>We appreciate the pressures for housing and competing land use challenges in the borough are made even more challenging in the face of climate change. However, your SPD should place emphasis on new development being built to be resilient to the effects of, and not contribute to, climate change. In particular, new housing will need</p>	<p>Noted. We acknowledge and agree with the importance of new development being resilient to climate change. The SPD refers to government advice on flood resilience measures (paragraph 12.9). The aim of this section in the SPD is not to explain all the details that should be covered in Flood Risk Assessments and other assessments but to explain when they are needed and</p>

Respondent Name	Comments	Council's Response
	<p>to ensure that it meets the requirements of the NPPF and TE2100 plan with regards to managing flood risk, and new housing will need to be sequentially tested to ensure that development is steered away from areas of tidal flood risk. Change of use developments to maximise the use of land, or the demolition of existing buildings in favour of new housing, must consider the constraints of tidal breach flooding, and be supported by a site specific flood risk assessment if they are proposed in a flood zone. Change of use to residential uses must also ensure that all sleeping accommodation to be located at or above the modelled tidal breach flood level (unless it can be demonstrated that a permanent fixed barrier is in place to prevent floodwater from entering any sleeping accommodation that is located below the modelled breach flood level).</p> <p>Tidal flood risk Your SPD vision should also prioritise adapting to the consequences of the environmental changes as result of climate change. Tidal flood risk management should be a priority for the borough, ensuring land use is resilient to current and future tidal flood risk. The borough is constrained by tidal flood zones and tidal breach flood risk. You should look to incorporate the latest policies based on climate change science, government advice and national policy. For example, the revised National Planning Policy Framework (NPPF) now requires all sleeping accommodation to</p>	<p>to refer to existing advice on where to find more information to produce these assessments.</p> <p>Policy CE2 of the Local Plan is in line with the NPPF, London Plan and it refers to the TE2100 plan too. We are aware of the change in EA's policy regarding sleeping accommodation in relation to breach levels. This change in policy took place after our Local Plan was examined and could therefore not be included in the current Local Plan. It will be however, included in the new Local Plan.</p> <p>Tidal flood risk is addressed by current policy CE2 as it refers to the TE2100 Plan and its actions. We consider that the SPD does not need to expand on this but the review of the Local Plan will consider the updates to the TE2100 Plan.</p> <p>The revised NPPF does not refer to or require sleeping accommodation to be located above the tidal breach. That is a change in EA policy which we are already</p>

Respondent Name	Comments	Council's Response
	<p>be located at or above the modelled tidal breach flood level (unless it can be demonstrated that a permanent fixed barrier is in place to prevent floodwater from entering any sleeping accommodation that is located below the modelled breach flood level). The Thames Estuary 2100 Plan (TE2100) focuses on the maintenance and raising of tidal walls and embankments, which should be a key priority to ensure the protection of the borough from current and future tidal flood risk.</p> <p>Riverside Strategies We would also encourage that you prioritise the riverside strategies plan as a holistic approach to promote green infrastructure and networks along the River Thames riverside frontage. The concept is for local authorities to produce riverside strategies to improve flood risk management in the vicinity of the river, create better access to and along the riverside and improve the riverside environment. This includes ensuring the provision of the raising of tidal flood defences to adapt to future climate change, and the provision of access to the riverside to ensure connectivity with the River Thames. Therefore a strategic priority for the borough should be to ensure access to the riverside is protected, enhanced and adapts to the challenges of climate change and population growth.</p>	<p>addressing and will refer to in the new Local Plan (please see comments above).</p> <p>The need for a riverside strategy will be considered as part of the review of the Local Plan. Strategic priorities for the borough are not considered as part of SPDs but as part of the Local Plan process.</p>

Respondent Name	Comments	Council's Response
Cornwall Mews South (West Side) RA (Philippa Jill Manasseh)	Use simple language. If an individual can do something say so.	Noted.
Kensington Society (Sophia Lambert)	<p>Section 12: Minimising flood risk Again this is an area where private gardens can play a significant role.</p> <p>We would like to see:</p> <ul style="list-style-type: none"> • an Article 4 Direction on paving and garden buildings in back gardens as well as front; • SUDs for any removal of any open land beyond a bare minimum; • more exacting requirements than 50% for surface water run-off; 	<p>The retention of front and rear gardens is key for the borough both as they provide natural drainage and biodiversity. The Local Plan policy CE2i already refers to the provision of permeable surfaces not only in front gardens but all landscaped areas.</p> <p>A section explaining the importance of gardens, their benefits and maintenance will be included in chapter 11, after the streetscape greening.</p> <p>We will also refer to the permeable surfaces requirements in landscaped areas to be in line with policy CE2i.</p> <p>Reference to the Article 4 Direction is noted but it is not part of the SPD process.</p> <p>Noted. SuDS are already required for all planning applications at ground and below ground levels (Local Plan Policy CE2g).</p> <p>50% betterment is required for minor development. Sites are normally constrained and, in some cases, even a 50% betterment cannot be achieved. Major development should achieve greenfield run-off which could mean over</p>

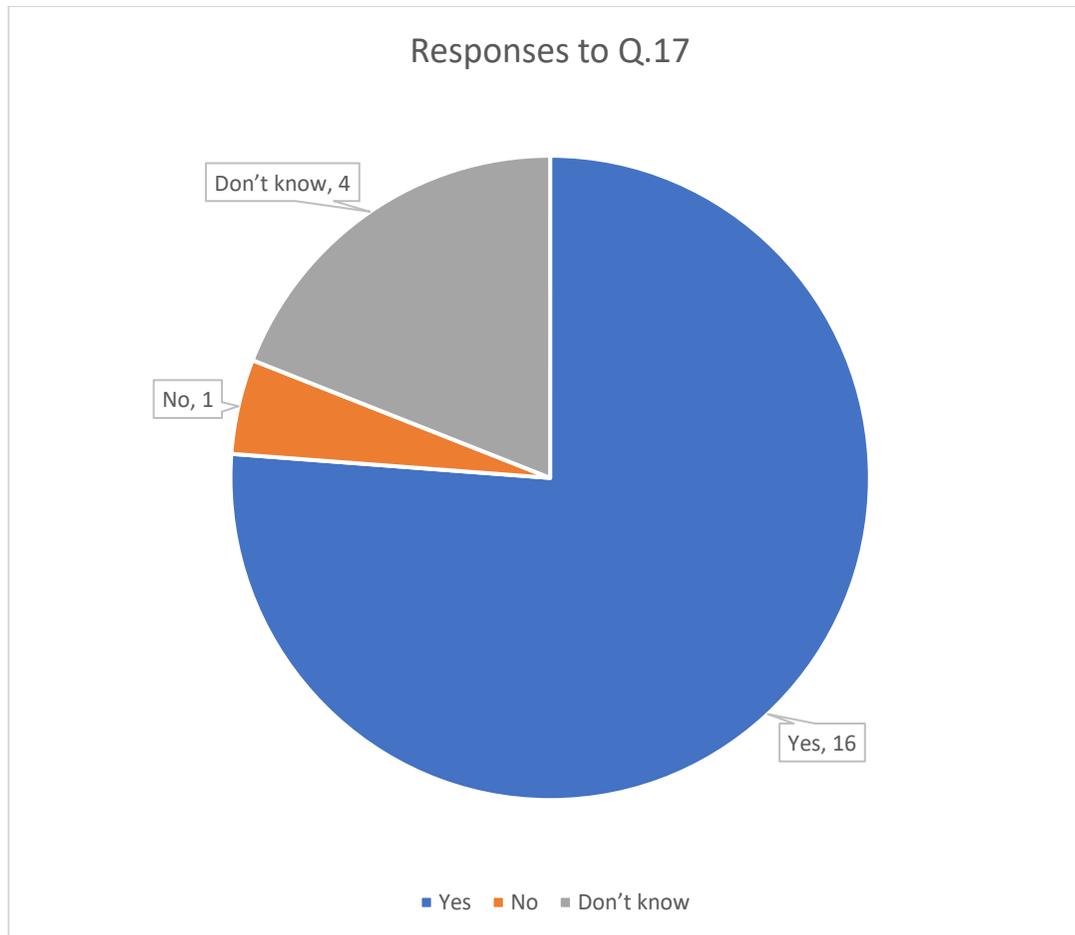
Respondent Name	Comments	Council's Response
	<ul style="list-style-type: none"> • encouragement of the use of grey water and water butts (curiously not mentioned in this document); • guidance to householders on minimising flood risk as suggested in paragraph 12.23 (which at present appears as a throwaway line). This should cover what can be done about existing paved areas. <p>We also urge that the aim in drainage plans – albeit not always achievable – should be clearly no new connections to the sewer.</p>	<p>90% betterment depending on the existing site conditions.</p> <p>The reuse of grey water and rainwater harvesting is encouraged and should be considered in Integrated Water Management Strategies. The omission of water butts is intentional as they can only provide any flood risk/drainage benefits if they are managed properly and emptied before a rainfall event occurs. Although smart water butts could help reducing water consumption, they should not be used instead of formal SuDS which can provide many more benefits.</p> <p>Information included in paragraph 12.23 refers to SuDS in small development rather than flood risk. Please refer to Examples of flood risk measures included in the box titled: Flood Risk Measures for examples of what can householders do to minimise and be more resilient to flood risk. The Council also has webpages on what residents and business can do before and after a flooding event which will be added after paragraph 12.5.</p> <p>The Local Plan policy CE2i already refers to the provision of permeable surfaces in all landscaped areas.</p> <p>Connection to the sewer system is normally required as SuDS could attenuate water during low intensity rainfall events but not during long-duration and high intensity</p>

Respondent Name	Comments	Council's Response
	<p>We are concerned that Figure 12.8 features an extension and an outbuilding, as this could be taken as encouragement to outbuildings – which, by taking green space in private gardens (a substantial green space in this figure) – are also bad for biodiversity. Not the image to use.</p>	<p>rainfall events. New connections may be needed, and existing manholes may need to be relocated. A requirement for no new connections to the sewer is unlikely to be reasonable, feasible or to provide any betterment in terms of flood risk. Water should be managed in a more natural way which will reduce the amount and speed of water entering the sewer.</p> <p>Noted. Figure 12.8 is meant to give an example of a type of planning application the Council already receives. It is meant to inform the type of SuDS that can be used rather than to encourage any type of development. No change.</p>
<p>St Helen's Residents Group (Jenny Harborne)</p>	<p>I would like to suggest that Counters Creek is made more of at the Little Scrubs- it was flowing over the turf and pavement in the recent wet weather can it be made into an open stream at this point with greater capacity? It could be a very attractive feature and avoid the flooding of the parkland that was occurring.</p>	<p>Noted. Natural flood management is a positive technique which should be considered by our parks' teams and the Local Flood Risk Management Strategy. The SPD is meant to guide development in developable areas rather than parks which will not be developed.</p>
<p>Cadogan Estates Limited (Jane Henshaw)</p>	<ul style="list-style-type: none"> It is suggested that an additional flood risk measure is included, namely ensuring plant rooms and electrical equipment are not located in basements where feasible. We appreciate that in refurbishment schemes this can be challenging. 	<p>Noted. Paragraph 12.9 refers to government's detailed guidance on flood resilience and resistance measures.</p> <p>We will add a further line under examples of flood risk measures (table in page 92) to explained that plant rooms and electrical equipment should not</p>

Respondent Name	Comments	Council's Response
		located in lower floors (basements, lower ground floors) where feasible.
CAMELLIA Research Project Imperial College London (Ana Mijic Pepe Puchol-Salort)	Although we found the information clear, we would like to mention a possible link between the flood risk assessment methods and the already mentioned PRC (Property Resilience Certificate).	Noted.
Labour Group of Councillors (Mohammed Bakhtiar)	The weather pattern changes, the amount of rainwater and the time of year at which it falls, (we know that London in the coming years is facing water shortage) the increase of electricity usage during summer for air conditioning units usage and even some new infectious diseases are all linked to climate change, which require us to take some special measures to tackle them.	Comment noted. The aim of the SPD is to address the impacts of climate change as far as possible through the current planning regime.

Sustainable Drainage

Q17: Is the information regarding SuDS requirement and implementation in different types of development clear?



If not, can you please explain how we can improve it?

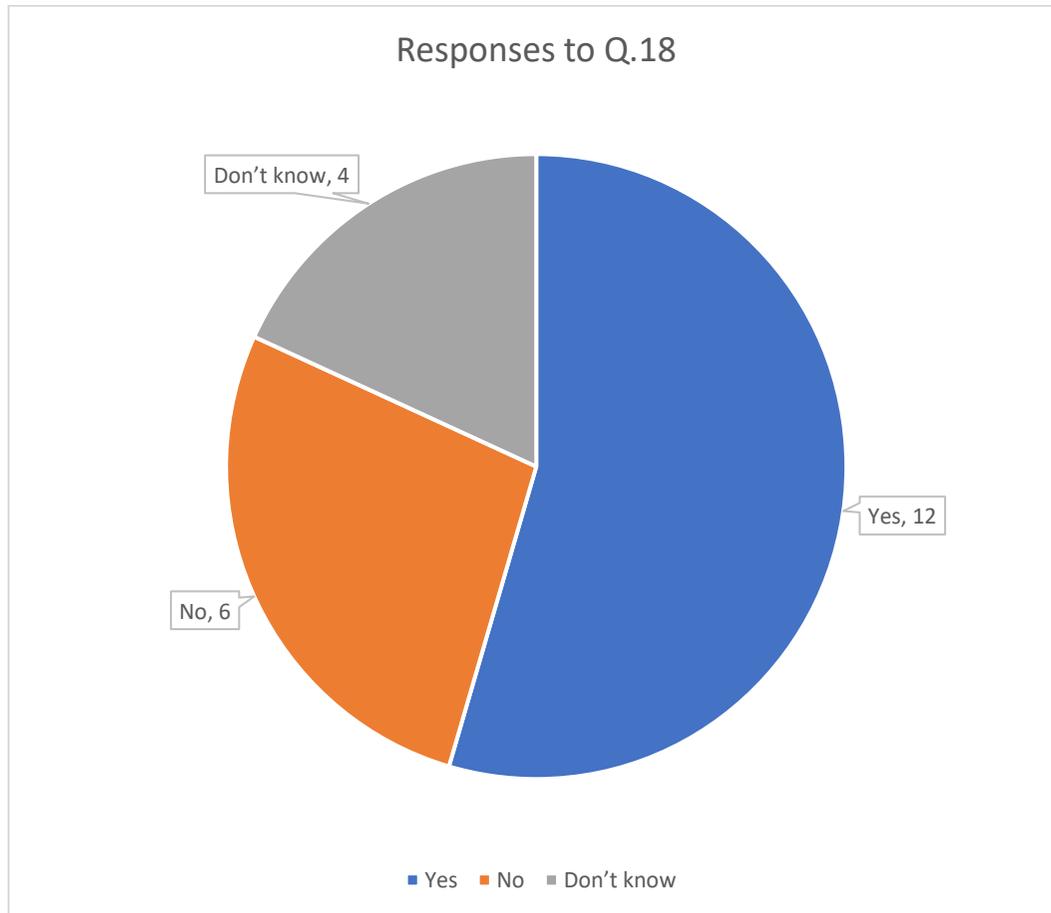
Respondent Name	Comments	Council's Response
G Thomson	<p>As set out in response to question 15, the SPD should recognise that the Borough is highly constrained, by both its size and the prevalence of heritage assets, which means that all development sites will need to be designed very efficiently. The SPD should recognise that SuDS can have physical constraints around sub-surface infrastructure, space, building layout, orientation, land uptake and soil condition and it should support a flexible approach to achieving these objectives. Where sites have constraints such as rail and underground lines for which impact must be negated the need for flexibility is acute.</p>	<p>Agreed. A sentence after paragraph 12.14 will be added to reflect the Borough's constraints (physical constraints around sub-surface infrastructure, space, building layout, orientation, land uptake and soil condition) which should be considered when designing SuDS.</p>
Environment Agency (Lisa Mills)	<p>We welcome the inclusion of surface water flooding in this SPD. London is at particular risk from surface water flooding, mainly due to the large extent of impermeable surfaces. In your current local plan, you have identified a need for Sustainable Drainage Systems (SuDS) to be commonplace throughout the borough, reducing the risk of flood events especially in the west of the borough when combined with the upgrading of Counters Creek sewer and storm drain. Your LLFA should identify through your Local Flood Risk Management Strategies and Surface Water Management Plans areas where there are particular surface water management issues and aim to reduce these risks. Development proposals should aim to</p>	<p>Support for the inclusion of surface water flooding in the SPD and Local Plan noted.</p> <p>The Local Flood Risk Management Strategy will be reviewed shortly and will include actions to address surface water flooding, preference of green over grey SuDS and reference to the London Sustainable Drainage Action Plan</p>

Respondent Name	Comments	Council's Response
	<p>achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the drainage hierarchy as identified in Policy SI 13 Sustainable drainage in the draft (2019) London Plan. Please also refer to the London Sustainable Drainage Action Plan that contains a series of actions to make the drainage system work in a more natural way with a particular emphasis on retrofitting. Often SuDs can be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity and contributing to biodiversity net gain, urban greening, amenity and recreation. However, it should be noted the SuDs should be used with caution if there is previous land contamination on site, or if the proposed development has the potential be contaminative, in the interests of groundwater protection. Infiltrating water has the potential to cause mobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of underlying groundwater resources.</p> <p>It is important that other sources of flooding are also considered. The borough includes areas of tidal flood risk, where tidal flood risk management should be a priority for the borough. This includes ensuring that new development is sequentially tested to steer</p>	<p>The multiple benefits of SuDS are noted and referred to in paragraph 12.14. of the SPD.</p> <p>Noted, land contamination issues are addressed at planning application but will also be included in paragraph 12.14 when referring to the site constraints to address when designing SuDS.</p> <p>Noted. Reference to the sequential test is included in paragraph 12.11.</p>

Respondent Name	Comments	Council's Response
	development away from areas of flood risk and complies with the	
Cornwall Mews South (West Side) RA (Philippa Jill Manasseh)	Use simple language what can an individual do.	Noted.
Cadogan Estates Limited (Jane Henshaw)	<ul style="list-style-type: none"> • SuDS on retrofits / small scale developments will be challenging where there is no outside space, especially when competing with other considerations such as green roofs, PVs and the UGF. This is made even more challenging with the proposed advice not to have attenuation tanks. • SuDS, particularly attenuation tanks, can be carbon-intensive in their build. 	<p>Noted. We understand that each site has different circumstances and constraints. They are addressed in each application. We agree that in some cases the provision of attenuation tanks is unavoidable but other, more green and sustainable SuDS should be considered first following the London Plan Drainage Hierarchy.</p> <p>Noted and agreed. Attenuation tanks can also be quite expensive to run and maintain.</p>

Section 13: Biodiversity

Q18: Is the information on how to meet the Council's requirements set out in paragraph 13.33 clear?



If not, can you please explain how we can improve it?

Respondent Name	Comments	Council's Response
Ladbroke Association (Sophia Lambert)	See general comment at the end on light pollution.	Noted. We have provided a response to the comment below.
London Wildlife Trust (Mathew Frith)	We support these requirements. Very comprehensive.	Support noted.
Canal & River Trust London (Claire McLean)	<p>Page 102 - 13 Biodiversity</p> <p>As with our comments, above, for Urban Greening, the Trust are happy to support improvements to biodiversity and habitat, where appropriate, on our network. Developments should provide mitigation for any adverse impact on biodiversity, including where this affects the canal environment.</p> <p>Lighting should be carefully considered where proposed near the canal, as this can affect bat foraging and its use as a commuting corridor. Proposals should be in accordance with advice from the Bat Conservation Trust.</p>	<p>Support and comments noted.</p> <p>As stated in section 13 of the SPD, the Council expects developers to follow the recommendations and guidance set out in the British Standards for Biodiversity: BS42020, to ensure that best practice can be implemented at each stage of the planning process and that developments are informed by sufficient and appropriate ecological information.</p>
Greg Hammond	I was pleased to see the reference to the 'bee superhighway' in the report, ie the encouragement of pollinator-friendly plants.	Support noted.
Luisa Cicognani	The only way to support biodiversity is to allow parks and garden to remain intact and no further building on them allowed	Comment noted.

Respondent Name	Comments	Council's Response
		<p>The Local Plan contains policy that seeks to protect our existing green space and natural environment (Policy CR5 for example). The Greening SPD is intended to supplement the current Local Plan, rather than taking its place or repeating policy.</p>
G Thomson	<p>ECDC supports the ambition for biodiversity net gain, but as set out above, ECDC remains concerned that the Greening SPD will place many competing demands on constrained development sites without recognising that some flexibility may be required to ensure that the most appropriate balance is achieved.</p> <p>There are only two opportunity areas in the borough and these sites must deliver a significant number of new homes and employment floorspace. Having sufficient space onsite to deliver the required biodiversity will require the utilisation of multiple green infrastructure types including green walls, green roofs, street trees, SuDS, planters, rain gardens etc. All of which will have to compete with aspects of development such as access routes and rooftop mounted plant and renewable energy systems. This must all be balanced with the need to deliver new homes and jobs, including affordable homes. The SPD should state that flexibility may be necessary in some circumstances.</p>	<p>Comments noted.</p> <p>However, the Greening SPD has been drafted in conformance with the policy requirements set by the New London Plan and objectives such as urban greening and biodiversity net gain will therefore be requirements going forward anyway.</p> <p>Schemes of the scale such as Earl's Court will need to consider a wide range of policies and possibly have exemplary standards. However, such issues will be dealt with on a site-specific basis rather than the SPD outlining limitations. The planning system allows for flexibility.</p>

Respondent Name	Comments	Council's Response
Environment Agency (Lisa Mills)	<p>We welcome the inclusion of biodiversity within this SPD. Policy GG2 'Making the best use of land' of the London plan (draft 2019) states that "protect and enhance London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening, including aiming to secure net biodiversity gains where possible". Also, the NPPF (paragraph 170) states that "planning policies and decisions should contribute to and enhance the national and local environment by... minimising impacts on and provision net gains for biodiversity." Therefore developments should include a requirement for proposals to achieve biodiversity net gain where it is feasible and proportionate to do so. Please refer to the guidance from Natural England for more detail on applying biodiversity net gain in planning. http://publications.naturalengland.org.uk/publication/5850908674228224 .</p> <p>Developments can improve biodiversity of the borough by:</p> <p>1) Incorporating SuDs (both in new developments and retrospectivity). SuDs can be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity and contributing to biodiversity net gain, urban greening, amenity and recreation.</p>	<p>Support noted.</p> <p>Section 13 of the SPD outlines the requirement that all development should have due regard for the protection and enhancement of biodiversity with the additional requirement for a 10% net gain with major development, which is in line with the New London Plan.</p> <p>1) Noted and agreed. The multiple benefits of SuDS are recognised in the SPD (figure 12.2).</p> <p>The Local Flood Risk Management Strategy will be reviewed shortly and will include actions to address surface water flooding, preference of green over grey SuDS and reference to the London Sustainable Drainage Action Plan.</p> <p>2) Section 13 of the SPD states that the Council expects developers to follow the recommendations and guidance set out in the British Standards for Biodiversity: BS42020, to ensure that best practice can be implemented at each stage of the planning process and that developments are informed by sufficient and appropriate ecological information.</p> <p>3) The need for a riverside strategy will be considered as part of the review of the Local Plan. Strategic priorities for the borough are not considered as part of SPDs but as part of the Local Plan process.</p>

Respondent Name	Comments	Council's Response
	<p>2) Enhancing and development ecological networks. The enhancement of biodiversity in and around the development should be led by a local understanding of ecological networks, and should seek to include:</p> <ul style="list-style-type: none"> - Habitat restoration, recreation and expansion. - Prioritising native species and invasive species management - Improved links between existing sites - Buffering of existing important sites - New biodiversity features within the development, and - Securing management for long term development. <p>3) Protecting and enhancing intertidal habitat. Any development within 16m of the River Thames should seek to protect and enhance the valuable intertidal habitat of the River Thames. Please see our estuary edges guidance for further information - https://www.estuaryedges.co.uk/</p> <p>We would also encourage that you prioritise the riverside strategies plan as a holistic approach to promote green infrastructure and networks along the River Thames riverside frontage. The concept is for local authorities to produce riverside strategies to improve flood risk management in the vicinity of the river, create better access to and along the riverside and improve the riverside environment. This includes ensuring the provision of the raising of tidal flood defences to adapt to future climate change, and the provision of access to the riverside to ensure</p>	

Respondent Name	Comments	Council's Response
	<p>connectivity with the River Thames. Therefore a strategic priority for the borough should be to ensure access to the riverside is protected, enhanced and adapts to the challenges of climate change and population growth.</p>	
Richard Crane	<p>With regard to paragraph 13.33 - in the case of the Acklam Road a large building will be built on a much needed green 'sink' with no NBG.</p> <p>If such a clear objective is set out then surely RBKC should not grant planning permission to a development that has such a negative impact on bio-diversity?</p>	<p>Comment noted.</p> <p>Once adopted the Greening SPD will be a material consideration in determining planning applications. Therefore, its requirements will apply to new developments in the Borough. The Acklam Road development was granted permission last year prior to the production of this SPD.</p>
RBKC (Charles O'Connor)	<p>This is not good enough. The only reference in the entire document to the existing tree stock in the borough (both private and street) is in the final paragraph and a passing reference. It should right up front. Trees are an enormously important part of greening. It fatally undermines the whole document to have this woeful lack of references. NB the widely held views of scientists that preservation of existing tree stock is the 'golden rule' and much more important than new planting (which will many many years to establish). There needs to be a whole section on the Council's presumption in favour of retaining existing trees and that tree consent for removal will generally be refused, absent exceptional</p>	<p>Comment noted.</p> <p>We agree that trees make an important contribution to greening the borough. As noted in section 11 of the SPD, the Council has committed to planting additional trees where possible and the Borough is already home to over 8,000 street trees. This aim is supported by Policy CR6 of the current Local Plan, which states the Council will require the protection of existing trees and provision of new trees.</p> <p>We will explore how the guidance on Trees in section 11 and 13 of the SPD can be expanded.</p> <p>In addition, the Council's Arboriculture Department has committed to updating the Council's Tree Strategy and</p>

Respondent Name	Comments	Council's Response
	<p>circumstances. https://www.bbc.co.uk/news/science-environment-55795816</p>	<p>Trees and Development SPD. Several of the references to British Standards and Council Documents in the Trees and Development SPD are out of date and this will be rectified.</p> <p>Similarly, the Tree Strategy needs an update. It is anticipated that both revised documents will be ready for adoption in 2022.</p>
<p>Cornwall Mews South (West Side) RA (Philippa Jill Manasseh)</p>	<p>Use simple language if an individual can do something say so.</p>	<p>Noted.</p>
<p>Ms Sarkis</p>	<p>It is clear but not strong enough. The borough is so built up there should be no scope to have "adverse effects" on the biodiversity hierarchy. This cannot be mitigated against at this very low common denominator. Any adverse effect on biodiversity should not be permitted.</p>	<p>Comments noted.</p> <p>Section 13 of the SPD outlines the requirement that all development should have due regard for the protection and enhancement of biodiversity with the additional requirement for a 10% net gain with major development, which is in line with the New London Plan. Under current planning legislation we cannot set requirements that go too far beyond the New London Plan in an SPD such as this.</p>
<p>Kensington Society (Sophia Lambert)</p>	<p>Section 13: biodiversity The Local Biodiversity Action Plan though old (2010/11 to 2014/15) it is still material and should be</p>	<p>Suggestion noted.</p> <p>There is a reference to the RBKC Biodiversity Action Plan in para. 13.6 pg. 103 of the SPD.</p>

Respondent Name	Comments	Council's Response
	mentioned along with appropriate maps. We particularly welcome para 13.23.	
Cadogan Estates Limited (Jane Henshaw)	This proposed requirement is supported, and aligns very well with Cadogan's green infrastructure target to increase the quality and quantity of greening in Chelsea, specifically increasing the Estate's UGF by 25% by 2030.	Support noted.
Earl's Court Area Action Group (Bella Hardwick)	<p>It would be useful for residents to see an indicative list of plants, trees and shrubs which the Council would be using in their Greening SPD policies and how these can help increase biodiversity.</p> <p>How can residents join in and help with biodiversity in their gardens, on their balconies or window sills?</p>	<p>Noted.</p> <p>Planning does not usually place requirements on what plants etc. can be used. The Council's Local Biodiversity Action Plan provides such information.</p>
CAMELLIA Research Project Imperial College London (Ana Mijic Pepe Puchol-Salort)	Although the information seems clear, it would be good to provide the necessary tools to properly measure the BNG or, even better, the ENG (Environmental Net Gain).	<p>Suggestions noted.</p> <p>The Council is currently in the process of a New Local Plan Review with the aim to adopt a New Local Plan in 2023. A key element of the work on the new plan will be to transfer the guidance outlined in this SPD into policy. This will be an opportunity to review the impact of the SPD and improve upon it where needed.</p> <p>We will look to add more detailed information regarding the tools to properly measure the BNG when formulating relevant policy in the New Local Plan.</p>

Overall SPD

Q19: Is there any other term you would like to be added to the glossary?

Respondent Name	Comments	Council's Response
Kerry Davis-Head	REGARDING DEVELOPMENT One would hope that all council led developments would conform to the paper, and in addition be long lasting, ie not requiring expensive alterations to update or even need demolition in future years. Future proof. Article 4 Directions will probably be needed to prevent wholesale destruction of the aesthetic of many Victorian Streets in Conservation Areas. If Government grant schemes become available, it may encourage some to replace windows and doors with ill matching replacements at the cheapest cost. Also to prevent a swathe of solar panels, it is not just the aesthetics that need to be considered, solar panels can cause much glare to properties opposite them.	Comments noted. Yes, once adopted the Greening SPD will be a material consideration in determining planning applications. Therefore, its requirements will apply to new developments in the Borough including the Council's own developments. Window replacement in conservation areas in the way described will require planning permission.
G Thomson	Net Zero Carbon	This is included in the glossary.
Richard Crane	Accountability	Noted. However, this is not a term referred to in the SPD and therefore it is not necessary to include them in the Glossary.
RBKC (Charles O'Connor)	Some typos need correcting.	Noted, these will be corrected.

Respondent Name	Comments	Council's Response
Cadogan Estates Limited (Jane Henshaw)	Responsible sourcing: Responsible sourcing considers a wide range of sustainability issues across entire supply chains, and by doing so encompasses various elements of resource stewardship, corporate responsibility and sustainable procurement practice. Responsible sourcing is assessed by looking at the responsible sourcing credentials of specified construction products using responsible sourcing certification schemes (definition used by BRE).	Noted. We will add the sustainable/responsible sourcing definition found in the GLA Circular Economy Guidance, 2020 to the glossary.
Earl's Court Area Action Group (Bella Hardwick)	Area Action Plan Meanwhile use Penalties Sustainability appraisal Transparency	Noted. We will add Sustainability Appraisal to the glossary. The other terms are not referred to in the SPD and therefore it is not necessary to include them in the Glossary.
CAMELLIA Research Project Imperial College London (Ana Mijic Pepe Puchol-Salort)	BGI = Blue Green Infrastructure ENG = Environmental Net Gain UNC = Urban Natural Capital UES = Urban Ecosystem Services	Noted. However, these terms are not referred to in the SPD and therefore it is not necessary to include them in the Glossary.

Q20: Do you have any other comments on the SPD?

Respondent Name	Comments	Council's Response
Jane Whewell	<p>Finally, we would urge greater clarity in the document of where provisions are requirements and where they are only 'advised' and where provisions apply only to major developments (a clear definition of major developments in different contexts would be helpful) and where provisions are requirements for all developments.</p>	<p>Comments noted.</p> <p>The wording in the document is deliberate and uses "require", "must" for definite requirements. Use of boxes setting out requirements adds further clarity. Where we cannot impose new policy or requirement, we have used word like "encourage", "seek" etc.</p> <p>We will add a definition of major development to the glossary.</p>
Ladbroke Association (Sophia Lambert)	<p>We generally welcome this SPD. However, the current draft suffers from trying to be all things to all people. Much of it is for the experts and/or relates only to major developments. Although there are a number of good suggestions as to what householders of existing buildings can do towards reducing their environmental impact, these are rather scattered around the document. We would suggest that there be a special chapter giving guidance to residential households, drawing all the relevant material together in an easy-to-read form. This chapter could then also be used as a free-standing guidance document for householder applicants for planning permission.</p> <p>We are disappointed that there is no section in this document on LIGHT POLLUTION, nor is there any</p>	<p>Comments noted.</p> <p>Section 9 of the SPD does provide detailed and in-depth guidance for householders on a range of interventions to improve the energy performance of existing buildings, including listed buildings and properties located in conservation areas. However, we will produce a separate guide for householders to sit alongside the SPD.</p> <p>The Issue of light pollution cannot be dealt with in this SPD. We considered the points made during the last Local Plan review and can look at this in the New Local Plan Review again.</p>

Respondent Name	Comments	Council's Response
	<p>Council policy on it except in respect of basement development. The dark green spaces provided by communal gardens and in areas where back gardens back onto gardens in the neighbouring street are a particularly valuable resource for biodiversity and there is plenty of evidence that many forms of wildlife can be adversely affected by night time light. We have referred above to the problems caused by large areas of glazing. Problems can also arise from over-use of external lights on houses and in gardens. Brightly lit shop windows and advertisements at night also cause light pollution and unnecessarily consume electricity and we would like to see this on the green agenda.</p>	
London Wildlife Trust (Mathew Frith)	We welcome and support it	Support noted.
Michael Stock (Michael Stock)	<p>Congratulations to the RBKC Cabinet member(s) and the officer team. Impressive scope and clarity. A pleasure to read, thank you.</p> <p>Given huge challenges we now face because of Brexodus, Covid, Climate and Biodiversity loss, this SPD gives some hope and confidence in RBKC's future as a good place to live and work.</p> <p>It is essential that RBKC Planning will have the</p>	Support noted.

Respondent Name	Comments	Council's Response
	necessary people, expertise and resources to lead the implementation of these Greening ambitions.	
Greg Hammond	Thanks to those who have worked hard to create this document, which should be a positive contributor to a cleaner, greener future for the borough. I strongly support the principles of the Circular Economy and Whole Life-Cycle Approach, which need to be embedded at the heart of the planning process, and the fitting of Renewable Energy sources (micro-generation).	Support noted.
Ewen Angus Cameron	<ul style="list-style-type: none"> • 200 years ago a pavement in the High Street would have been considered unnecessary. 200 years later the rest of Europe has recognised that bikes should be prioritised over cars as the norm. Your recent actions demonstrate a 19th century mindset. • Electric vehicle charging spaces should not be permitted parking spaces for petrol vehicles, vide the space in Abingdon road on the corner of Pater Street. 	<p>Comments noted.</p> <p>The Council is supportive of facilitating electric vehicle charging infrastructure and promoting sustainable and active transport methods over the private car. This is outlined in section 10 of the SPD as well as the current Local Plan (Policy CT1 for example). However, we are also aware that many residents rely on the use of a private car, particularly for work, and electric vehicles continue to be financially inaccessible to many. The Council does not wish to penalise residents for using a private car but rather encourage greater usage of sustainable modes of transportation as much as possible.</p>
Anselm Frost	It does not always seem user friendly or easy to follow for the average Borough resident (see Paragraph 9.52 as an example of obscure and offputting text).	Comment noted. We will produce a separate guide for householders to sit alongside the SPD.

Respondent Name	Comments	Council's Response
Kerry Davis-Head	<p>IN CONCLUSION</p> <p>We urgently need a detailed consultant led look at Lots Village to ensure any new development is sympathetic and addresses the need for open space, open space lost by recent developments. Open space now over populated by surrounding developments, overbuilt therefore removing their own open space. A whole new scheme of greening is needed, street trees, planting, some of which can be done now without massive reports being needed.</p>	<p>Comments noted.</p> <p>The SPD's function is to set policy principles to guide development across the borough. The Council is exploring undertaking a number of character studies across the borough as part of the ongoing work on the New Local Plan.</p>
Natural England (Victoria Kirkham)	(Response via Sharon Jenkins- Operations Delivery Consultations Team)	Noted.
Gaunt	<p>There should be clearer guidance given as to materials which can be recycled. For example it is not clear from current guidance what forms of paper can be recycled (I understand for example that tissue paper cannot) and whether polythene (e.g. the covers supplied by dry cleaners) and cellophane can be recycled.</p>	<p>Noted.</p> <p>Recycling leaflets should be included in welcome packs.</p> <p>Tissue paper, cellophane and polythene covers cannot be recycled in with mixed recycling in K&C.</p> <p>For more information about what can and cannot be recycled visit:</p> <p>https://www.rbkc.gov.uk/bins-and-recycling/rubbish-and-recycling/recycling/about-recycling</p> <p>And</p>

Respondent Name	Comments	Council's Response
		<p data-bbox="1216 296 2011 368">https://www.rbkc.gov.uk/bins-and-recycling/rubbish-and-recycling/recycling/z-recycling</p> <p data-bbox="1216 392 2011 536">We will add an additional section explaining the requirements for municipal waste and recycling that development should meet at the end of section 3 of the SPD after figure 3.2.</p>
G Thomson	<p data-bbox="465 579 1182 871">There are significant challenges associated with bringing forward large scale developments that will be phased over a long period of time. In such circumstances, the SPD should support a framework approach that builds in appropriate flexibility for future reserved matters applications. This should also be reflected in the planning obligations and the timing of any mitigation.</p> <p data-bbox="465 911 1149 943">On behalf of Earls Court Development Company</p>	Comments noted.
Knightsbridge Neighbourhood Forum (Simon Birkett)	<p data-bbox="465 968 1003 1032">Response as Clean Air in London- not Knightsbridge Neighbourhood Forum</p> <p data-bbox="465 1078 1189 1366">Thank you for the opportunity to comment on this draft SPD. We support the vast majority of it but consider that it needs to be clearer about 'end-points' that must be achieved for each building by 2040; stronger in wording to ensure that outcomes are met; and encompass all development, including refurbishment requiring planning permission, not only major development. If necessary, please</p>	<p data-bbox="1216 968 1469 1000">Comments noted.</p> <p data-bbox="1216 1027 2029 1203">The SPD is one facet in achieving the 2040 target. The Council will produce a separate Green Plan bringing together aspects across the Council in a holistic way. The SPD only links with what planning can influence in the built environment.</p> <p data-bbox="1216 1230 2029 1374">The Council produced a Screening Statement on the Greening SPD in July 2018. As per the relevant regulations, Historic England, Natural England and the Environment Agency were consulted on this Screening</p>

Respondent Name	Comments	Council's Response
	undertake a full SA/SEA on plan that will achieve the necessary outcomes by 2040 at the latest.	<p>Statement. This consultation period ran from 3 July 2018 to 8 August 2018. The Council received responses on the Screening Statement from the three consultation bodies. All confirmed that a Strategic Environmental Assessment or Sustainability Appraisal was not required.</p> <p>The Council's final Screening Opinion, after consulting the consultation bodies and taking into account the criteria specified in Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004, is that the Greening SPD does not require a SEA/SA. The reasons are set out in the Screening Statement (July 2018).</p> <p>This response can be found on our webpage: (https://planningconsult.rbkc.gov.uk/consult.ti/GreeningSPD/consultationHome) under Supporting Documents.</p>
Rick Britt	13 Tree retention; some recent and current developments have, or will, result in the loss of mature trees. Developments should retain or work around existing trees, or replace 'like for like' AND add extra.	<p>Comment noted.</p> <p>We agree that trees make an important contribution to greening the borough. As noted in section 11 of the SPD, the Council has committed to planting additional trees where possible and the Borough is already home to over 8,000 street trees. This aim is supported by Policy CR6 of the current Local Plan, which states the Council will require the protection of existing trees and provision of new trees.</p> <p>In addition, the Council's Arboriculture Department has committed to updating the Council's Tree Strategy and Trees and Development SPD. Several of the references</p>

Respondent Name	Comments	Council's Response
		<p>to British Standards and Council Documents in the Trees and Development SPD are out of date and this will be rectified.</p> <p>Similarly, the Tree Strategy needs an update. It is anticipated that both revised documents will be ready for adoption in 2022.</p>
KRACR (Chris Lenon)	<p>The Council should describe how the funds raised by offsetting charges will be used and which organisations will be used to undertake offsetting activities.</p> <p>The geographical restrictions on offsetting should be described (ie should the activities only be in the UK?).</p> <p>The structure of payments should be described.</p> <p>**PLEASE NOTE** Author now representing The Chelsea Society</p>	<p>Comment noted.</p> <p>To accord with the requirements of the London Plan, from the 1st April 2017, the Council has been implementing the zero-carbon standard through the creation of a Carbon Offset Fund. The Council prefers that the zero-carbon requirement is met on site and carbon offset is the last resort. However, where it cannot, the Council has a carbon offset fund.</p> <p>The Council have developed a list of diverse potential projects which are aligned with the Council's priorities and values, climate emergency declaration and carbon neutral targets and action plan and projects which would achieve carbon savings. The Council is using the GLA's Guidance for London's Local Planning Authorities on establishing and funding carbon offset funds. The key criteria identified to determine which projects will be funded is: 'carbon reduction and lifetime carbon cost effectiveness, additionally and community/co-benefits'.</p> <p>Projects focused on public buildings where residents and the community have access (e.g. libraries, social housing,</p>

Respondent Name	Comments	Council's Response
		<p>community centres, schools etc.) are also considered a priority. Flexibility is recommended to allow for a range of projects to be supported. Programmes/initiatives which have wide-ranging benefits for the fuel poor will not be discounted.</p> <p>Please see the Council's Environment Select Committee report for more information: https://www.rbkc.gov.uk/council-councillors-and-democracy/open-data-and-transparency/environment-select-committee</p>
<p>Lots Village Chelsea Association of Residents and Businesses (Martyn Baker)</p>	<p>Rosemary and Martyn Baker - RESPONSE NOT DENOTING LOTTS VILLAGE CHELSEA ASSOCIATION DELEGATION AS PER INOVEM</p>	<p>Noted.</p>
<p>Environment Agency (Lisa Mills)</p>	<p>No further comments</p>	<p>Noted.</p>
<p>The Knightsbridge Association (Carol Seymour-Newton)</p>	<p>The Knightsbridge Association (KA) is pleased to respond to your consultation on the Draft Greening SPD. We support your direction of travel but consider that you need to be clearer about the scale and urgency of what must be achieved by all forms of development and refurbishment requiring planning permission, not relying so on major development, by 2040 at the latest. This clarity</p>	<p>Comments noted.</p> <p>Though we have the target to be a carbon neutral borough by 2040, we are aiming for all Council operations to become carbon neutral by 2030. The Council's Climate Change Team are working on producing a new Climate</p>

Respondent Name	Comments	Council's Response
	<p>needs to be backed then by robust wording and requirements in your Greening SPD to deliver those outcomes in that timescale. Please also conform the Greening SPD fully with the New London Plan's requirements for Air Quality Focus Areas, air quality generally and the minimising and eliminating of greenhouse gas emissions.</p>	<p>Emergency Action Plan to outline how we plan to achieve this target.</p> <p>The 2040 target for the whole borough is particularly ambitious in Kensington and Chelsea due to the historic nature of most of the residential building stock. The requirements set throughout the SPD, which are predominantly focused on major development, conform with the requirements set out in the New London Plan and we cannot set policies that go too far beyond these in an SPD such as this.</p> <p>Regarding air quality, the Council is aware that the Borough's air quality is of major concern. Section 10 of the Greening SPD sets out our guidance for how all development proposals can ensure they give due regard to air quality considerations and the requirement that new development must be air quality neutral, requiring no negative impact on air quality. These requirements conform fully with those set out in the New London Plan, Policy SI 1 in particular. The Air quality neutral objective is soon to be superseded by an air quality positive objective, which the GLA is due to provide guidance on in due course.</p> <p>We note that reference to Air Quality Focus Areas as outline in Policy SI 1 of the New London Plan have been omitted and we will add this to para. 10.1 of section 10 of the SPD (pg. 64).</p>

Respondent Name	Comments	Council's Response
		<p>Finally, almost all sections of the SPD, from the whole life cycle carbon approach, energy policies and retrofitting existing buildings, to urban greening and biodiversity aim to reduce carbon emissions across the Borough and are in full conformance with relevant policies in the New London Plan.</p>
Richard Crane	<p>The executive summary states; 'Climate Change is one of the greatest challenges of our times and in October 2019, the Council declared a Climate Change Emergency.'</p> <p>It continues, 'This means that there must be a step change in how we, and our businesses, residents and local organisations, operate so the Council is carbonneutral by 2030 and that the Borough can become carbon-neutral by 2040.'</p> <p>I wholeheartedly agree with both statements.</p> <p>However I see little evidence that RBKC is sincere in its stated intention of making that 'step change' in how it operates. In terms of its proposed new builds I see it delivering 'more of the same/whats gone before' - rather than seek new ways to deliver buildings that are holistically sustainable and have a small a carbon footprint as possible.</p> <p>When will RBKC make that step change?</p>	<p>Comments noted.</p> <p>The SPD is one facet in achieving the 2040 target. The Council will produce a separate Green Plan bringing together aspects across the Council in a holistic way. The SPD only links with what planning can influence in the built environment.</p>

Respondent Name	Comments	Council's Response
	<p>Ensuring a new build is energy efficient or SuDS compliant are just two minor considerations that need to be taken in its planning. Any new build will have both a long and short term effect on the local neighbourhood/community & ecology. There are many factors that need to be weighed up when delivering a new build.</p> <p>My overriding concern is that, like the vast majority of organisations in the UK and across the world, when it comes to the environment RBKC will say one thing and do another.</p> <p>Its been said, that in terms of climate change the human species will go through three stages; denial, indifference followed by blind panic. My view is that while the SPD may have been drafted with good intentions the current actions of RBKC demonstrates it falls neatly into the second stage.</p>	
DP9 (Dan Fyall)	<p>St William is client-</p> <p>Note some graphical errors throughout with letters missing from words.</p>	<p>Noted.</p> <p>We will correct all errors in the document before publishing.</p>
RBKC (Charles O'Connor)	<p>Need to refer to our soon to be policy of 100% active electric charging points in new builds. Trees are the most important omission from this document</p>	<p>Comment noted.</p> <p>The policy of 100% active electric charging points in new builds will be set by the New Local Plan but</p>

Respondent Name	Comments	Council's Response
	and significant expansion is needed regarding protection of the existing tree stock.	<p>cannot be set out requirement in this SPD as it is not a policy in the current Local Plan.</p> <p>We agree that trees make an important contribution to greening the borough. As noted in section 11 of the SPD, the Council has committed to planting additional trees where possible and the Borough is already home to over 8,000 street trees. This aim is supported by Policy CR6 of the current Local Plan, which states the Council will require the protection of existing trees and provision of new trees.</p> <p>We will explore how the guidance on Trees in section 11 and 13 of the SPD can be expanded.</p> <p>In addition, the Council's Arboriculture Department has committed to updating the Council's Tree Strategy and Trees and Development SPD. Several of the references to British Standards and Council Documents in the Trees and Development SPD are out of date and this will be rectified.</p> <p>Similarly, the Tree Strategy needs an update. It is anticipated that both revised documents will be ready for adoption in 2022.</p>
Cornwall Mews South (West Side) RA (Philippa Jill Manasseh)	Please have a short clear summary.	Noted. This is provided in the executive summary and on page 7 in 'Greening SPD on a Page'.

Respondent Name	Comments	Council's Response
V Rowlands	<p>Really welcome this overall initiative. However I think it undersells the role of active travel, in favour of a skewed and short-termist focus on electric vehicles.</p>	<p>Noted.</p> <p>Section 11 of the SPD sets out requirements and encourages development to support active and sustainable travel modes.</p> <p>The Greening SPD is intended to supplement the current Local Plan rather than taking its place or repeating policy. Key themes and objectives of the Local Plan such as Chapter 24 – Respecting Environmental Limits and the promotion of sustainable and active modes of transportation such as cycling and walking over the private car (Policy CT1 for example) remain valid. These objectives will be continued in the New Local Plan which the Council is now in the process of producing, with the aim to adopt the new plan by 2023.</p>
Ms Sarkis	<p>It's a great start but has much more scope to be much stricter about removing any green areas that are left and implementing green corridors in a mandatory way.</p> <p>Concrete has crept over a large proportion of the green areas that would have been on a map of the borough 30 years ago. Could we have a map of that perhaps? It would illustrate what we are striving to save.</p>	<p>Comments noted.</p> <p>Sections 11 and 13 of the Greening SPD provides detailed guidance on providing green infrastructure and enhancing biodiversity through development, setting out the requirement for all new residential development to meet an urban greening factor score of 0.4 and 0.3 for non-residential development, as well as 10% biodiversity net gain.</p> <p>The Greening SPD is intended to supplement the current Local Plan, rather than replacing or repeating policy. The current Local Plan contains policies that support the provision of green infrastructure within development and</p>

Respondent Name	Comments	Council's Response
		seek the protection and enhancement of existing green infrastructure, biodiversity and habitats (Policy CR5, CR6 and CE4 for example).
Jonathan Rose	What about mention of encouraging more walking and bicycling?	<p>Noted.</p> <p>Section 11 of the SPD sets requirements and encourages development to support active and sustainable travel modes.</p> <p>The Greening SPD is intended to supplement the current Local Plan rather than taking its place or repeating policy. Key themes and objectives of the Local Plan such as Chapter 24 – Respecting Environmental Limits and the promotion of sustainable and active modes of transportation such as cycling and walking over the private car (Policy CT1 for example) remain valid. These objectives will be continued in the New Local Plan which the Council is now in the process of producing, with the aim to adopt the new plan by 2023.</p>
Kensington Society (Sophia Lambert)	<p>Miscellaneous omissions</p> <p>There is nothing on light pollution; or on the energy expenditure of shops lit 24/7; or the increase in open fronted shops and cafés which compensate with increased A/C within or have heat flow increase at the front – acceptable during the pandemic but to be discouraged longer term given the enormous amount of energy expended by such equipment..</p>	<p>Noted.</p> <p>The Issue of light pollution cannot be dealt with in this SPD. We considered the points made during the last Local Plan review and can look at this in the New Local Plan Review again.</p> <p>Regarding the format and structure of the document. We have aimed to make the SPD as clear and reader friendly as possible. However, it is a statutory planning document</p>

Respondent Name	Comments	Council's Response
	<p>General</p> <p>We welcome this Greening SPD and fully support its purpose. However, we do find that it suffers from trying to address too many audiences at once. A lot of it is highly technical, and useful only to major developers and their consultants and contractors. Although Section 9 on retrofitting has been drafted with the householder in mind, it covers only some of the issues important for householders. We therefore urge that the document be restructured to make it more accessible to householders while at the same time retaining the technical material useful for major developments. There are various ways that this can be done, including more use of annexes for the technical material. If this document is, as we hope, put up on the RBKC website in HTML form rather than a clumsy PDF, it could be made much shorter with links to relevant tables etc. This would also enable convenient cross-references to relevant parts of the Local Plan.</p> <p>The niceties of “must” and “should” are often lost on the uninitiated. It should be made clearer what is legislative requirement and what is guidance.</p> <p>The attached Annex by Michael Bach makes various points particularly on the structure of the document. It is supported by the Kensington Society and we would be grateful if it could be treated as part of our response.</p>	<p>and therefore we are operating under certain requirements in terms of the what the document can include, its focus and how it is structured and formatted.</p> <p>We will produce a separate guide for householders to sit alongside the SPD.</p>

Respondent Name	Comments	Council's Response
Michael Bach	<p>This is an ambitious, even heroic, scoping exercise to identify a wide range of policy areas associated with tackling and mitigating the challenges of Climate Change. Ultimately the challenge will be to translate these into a strategy and, in particular, to translate or operationalise these requirements into policies in the revised Local Plan.</p> <p>The document covers a lot of ground and it is quite a lot for people to get their head round. The main thing is be able not only to see the individual "action" boxes, but to grasp the total picture. The first chapters sketch out the scope, including the diagram on page 7, and Appendix 1 provides a guide to current policy tools, mainly GLA documents, but also highlights the gaps in the current Local Plan. The challenge is to provide a matrix of requirements, by size of project, to make this 120-page SPD more accessible.</p> <p>Coverage: Missing spatial dimension</p> <p>A missing element is the role of the spatial strategy, which is not covered by a passing reference to encouraging active modes (paras 10.13 and 10.14). We need to reduce the need to travel by car by promoting walkable neighbourhoods which provide a community's daily needs within easy walking</p>	<p>Missing spatial dimension</p> <p>As you have identified the objective of encouraging walkable neighbourhoods is already established by the Local Plan and is a policy that will continue in the new Local Plan. The Greening SPD is intended to supplement and sit alongside the Local Plan. Therefore, it doesn't need to repeat Policy CK2.</p> <p>From scoping policies to put into practise</p> <p>The SPD outlines a range of guidance that can be put into practise immediately and its requirements will be a material planning consideration upon the SPD's adoption. The London Plan was adopted on 2nd March meaning its policies must be considered in all planning applications going forward.</p> <p>Terminology</p> <p>The wording in the document is deliberate and uses "require", "must" for definite requirements. Use of boxes setting out requirements adds further clarity. Where we cannot impose new policy or requirement, we have used word like "encourage", "seek" etc.</p> <p>Scale: Major vs Minor</p> <p>The SPD only sets requirements for major development. This is in line with the New London Plan and we cannot go beyond this and set requirements for minor development in an SPD such as this.</p>

Respondent Name	Comments	Council's Response
	<p>distance either 5 or ten minute walking distance of home.</p> <p>This is already a strategic objective (CO1), paras 18.2.1 to 18.2.5, 18.3.8 to 18.3.17 and Policy CK2.</p> <p>I understand that this will be refreshed in the new Local Plan, but it should be articulated here in a separate chapter.</p> <p>From scoping to policies to put it into practice</p> <p>The individual chapters identify the actions that will be needed, but it is not clear which actions can be taken now, such as using the London Plan and other GLA SPGs, and which areas will need to wait for new Mayoral policies or for our new Local Plan. Appendix 1 identifies what exists now, but there is a need to identify where new policies are expected or will need to be developed. Appendix 1 does not identify the “gaps” or the scope for developing new policy, such as</p> <ul style="list-style-type: none"> • further GLA SPGs or further RBKC SPDs; and • new Local Plan policies and new GLA policies in the next London Plan; or even • new National policy. 	

Respondent Name	Comments	Council's Response
	<p>Perhaps something like Appendix 1 could be developed for the range of actions, colour-coded/traffic lights(?) for availability/imminent/to be developed. We are hoping to start using some of these policies.</p> <p>There is a big task ahead to – this scoping exercise is a useful roadmap.</p> <p>Terminology</p> <p>There are two key tests in policy – the degree of advocacy, such as using “should” and “must” and the strength of the active verbs, such as “encourage” and “require”. Should appears 162 times and must appears 38 times. There is a need to be clear where the policies referred to have that degree of requirement. Encourage is mentioned 37 times, whilst require occurs 156 times.</p> <p>Need for additional assessments</p> <p>Some major projects are subject to various types of environmental assessments, which can stipulate not only noise, vibration and dust limits, but also specify emission levels for vehicles and machinery.</p> <p>Scale: Major v Minor</p>	

Respondent Name	Comments	Council's Response
	<p>Some the proposed measures appear to only apply to major projects. Such as circular economy, whole life-cycle approach, reduced energy demand, heat networks, energy assessments, renewable energy, net-zero carbon, air quality, greening, flood risk</p> <p>It would be worth presenting a matrix segmented by project size, in order to both developers and the community to see what assessments are likely to be required – almost like validation criteria.</p> <p>Finally, as a guide to what is required for different types of development, a matrix which sets out what is needed for each aspect by size of project could be a handy way into this for planning officers, developers and residents.</p>	
St Helen's Residents Group (Jenny Harborne)	<p>It's really too long! Can you shorten it massively with all the more detailed information in appendices? Main body could contain- We want to do this For how to, or detailed explanation see appendix (ie you should not have in the main body an explanation of what a solar panel is!)</p>	<p>Noted.</p> <p>Regarding the format and structure of the document. We have aimed to make the SPD as clear and reader friendly as possible. However, it is a statutory planning document and therefore we are operating under certain requirements in terms of the what the document can include, its focus and how it is structured and formatted.</p> <p>We will produce a separate guide for householders to sit alongside the SPD.</p>

Respondent Name	Comments	Council's Response
Cadogan Estates Limited (Jane Henshaw)	<p>Generally, Cadogan is pleased to support this proposed SPD, aside from the issues laid out above.</p> <p>Our principle concern is the proposed 30-year cost of offset will act as a property tax, preventing development and hindering progress towards the Borough's sustainability goals. Furthermore, the planning requirements need more flexibility than is currently proposed, ensuring they are workable and appropriate for this part of London.</p>	Support noted, please see relevant sections where responses to comments have been provided.
Earl's Court Area Action Group (Bella Hardwick)	<p>The Council should pay special attention to the Earls Court Masterplan site and designate it as a priority within the SPD. The development will have an enormous impact on the centre of the borough; on our roads, on traffic flows, and the Council needs to come forward with 21st century methodology for waste disposal and power generation. We support adopting the principles in the GLA's Urban Greening Factor For London.</p> <p>The height, scale and massing will impact on wind circulation, telecommunications, light, and sunlight. Greening and green space with sunlight has to be central to the design to promote physical and mental health and wellbeing.</p> <p>Has the Council any intention of benchmarking with best in class in the UK and worldwide when it comes to its Greening SPD? If the answer is no</p>	<p>Comment noted.</p> <p>The Greening SPD is intended to establish principles to guide development across the borough rather than set out detailed guidance and requirement for specific sites. Site specific issues linked to Earl's Court are beyond the scope of this SPD and will be dealt with on a site-specific basis.</p> <p>Regarding green/play spaces, the multiple benefits of green infrastructure is recognised in figure 12.2.</p> <p>The Council's Parks Strategy, 2016-2025 sets out the Royal Borough of Kensington and Chelsea's priorities for deployment of its resources in parks and open spaces and can be found at the following link: https://www.rbkc.gov.uk/sites/default/files/atoms/files/Parks%20Strategy%202016-2025.pdf</p>

Respondent Name	Comments	Council's Response
	<p>please explain and if yes, how will this be achieved?</p> <p>How will the Council communicate its greening strategies in the SPD to the public on an ongoing basis?</p> <p>Provision for the needs of disabled people and the elderly and how they can be involved in greening the borough should be included in the Greening SPD.</p> <p>Green play spaces for children and green spaces for youths are not featured in the Greening SPD, we think these should be included and Play England are keen to see a range of play spaces in all urban environments. http://www.playengland.org.uk/resource/design-for-play</p> <p>Who within the Council, (who is accountable to the electorate) will be leading the greening of the borough and how will residents interact with them specifically on this issue?</p> <p>What resources will the Council be allocating for this process and how will this be arrived at?</p>	<p>Strategic greening is a Council wide issue and is beyond what is achievable in this SPD, which focuses on securing greening on-site with development that comes forward.</p>

Respondent Name	Comments	Council's Response
<p>CAMELLIA Research Project Imperial College London (Ana Mijic Pepe Puchol-Salort)</p>	<p>The Greening SPD seems a very comprehensive and useful guide towards urban sustainability for the RBKC.</p> <p>We would like to suggest considering an integrated approach that includes all these sections in one general and common framework. One example of this could be the Urban Planning Sustainability Framework (UPSUF), which is now at the proof-of-concept stage and is aimed to be applied in real case studies at different scales (reference: Puchol-Salort, P. et al. (2021). An urban planning sustainability framework: Systems approach to blue green urban design. Sustainable Cities and Society 66: 102677). In the next stages of this work, we are planning to link the evaluation criteria with approved certifications and the PRC from Policy Connect.</p>	<p>Support and suggestions noted. The Council supports and collaborates with the Camellia Research project and will continue to do so.</p>
<p>Geoffrey Roome</p>	<p>A. As a few particular of mine, is due to RBKC for:</p> <p>1. Terry Oliver & his team, & indeed to Council Members for giving him longevity in his role & for giving him latitude in his getting on with it with his own enterprise.</p> <p>It is always a pleasure to be out & about seeing how his raised beds are coming along & what a healthy social part they play within communities in varied locations.</p> <p>It is 10 years since the Council's celebration of the environmental improvements made in North</p>	<p>Support for the work done by Terry Oliver and his team noted and welcomed. This will be passed on.</p> <p>Support for Streetline noted and welcomed. This will also be passed on.</p> <p>Support for public parks and street trees noted.</p> <p>Unfortunately, we cannot set any requirements on air travel or Deliveroo drivers through this SPD or the Local Plan, as these are outside the remit of these documents.</p> <p>The borough's dense historic pattern of development and the close proximity of buildings means that new buildings</p>

Respondent Name	Comments	Council's Response
	<p>Kensington (enjoyably marked in the Town Hall on 10th May 2011). Such continuity is important.</p> <p>2. Streetline, with in my experience prompt in failing courtesy on the phone. Josh Goode began the drive for in grotspots which has worked. (However, do many people know about Streetline? Whenever I say "Ring Streetline & they will take away that dumping" I am met with astonishment that there is such an outfit.)</p> <p>3. Public parks & playgrounds – e.g. Arondale always a local pleasure. Emslie Horniman also: an underappreciated asset.</p> <p>4. Street trees planting & maintenance (bar sometimes excessively frequent polluting & lopping, just when arrives).</p> <p>5. Recent 20 mph restrictions (bring on e.g. Westminster blanket limit?) – difficult to enforce e.g. Kensington Road – Kensington Grove!</p> <p>B. The elephant in the room is of course the runway – its flightpath over our heads & general reconfigurations. I attended the public consultations (especially Cavendish Square), & while it seems the present set beacons led paths will anyway be replaced by a GPS-led setter of approaches & departures, night flights will become presumed eastwards (because we have as much open space which counts as our density of living...) & there will</p>	<p>and extensions need to take careful account of the living and working conditions of neighbours, with particular regard to natural light, light pollution, privacy, noise and disturbance. This issue is included within the requirements set out in Policy CL5 of the current Local Plan, which states that the Council will require all development ensures good living conditions for occupants of new, existing and neighbouring buildings.</p> <p>The Greening SPD is intended to supplement the current Local Plan and be read and understood alongside it. Rather than taking its place or repeating policy.</p> <p>That said, the historic character and dense nature of the borough means that the living conditions that might be expected elsewhere in modern developments are most unlikely to be achieved here. Particular attention needs to be paid to these matters to attempt to address rising public expectations in relation to living conditions, including access to open space. However, implementing living conditions by fixed standards, normally derived from modern suburban development, could undermine the Council's duty to preserve and enhance the character and appearance of conservation areas. It is the overall design, taking all factors into account including the area's character, that will be the determinant of whether a proposal provides reasonable living conditions.</p>

Respondent Name	Comments	Council's Response
	<p>be no general presumption of in from & out to "westward". I never noticed RBKC joining in with other boroughs in objecting to this huge threat to all of us.</p> <p>C. The immediate plague locally is the Deliveroo (there are often outfits contributing of course; & just wait for Amazon to arrive). The stream of scooters is uninterrupted from 7 am to 11:30 pm. The Portobello area's eateries will in an open economy remain issuing canteens for these fleets of scooters. They are noisy & polluting, & shameless about racing in batches. The new 20 mph surface signs are a waste of white paint. We have never known such uninterrupted street noise: near impossible to stop & chat on pavements; windows have to be shut to use the phone; neighbours in ground floor single-aspect units with bedrooms next to the pavement complain very strongly indeed.</p> <p>It can only get worse. It is telling that Deliveroo itself advertises with a picture of a hard young cyclist, never a scooter (or, increasingly, heavy CC motorbikes; & why are they all learners with L plates?) Could RBKC please consider how within the law by SPD format this public nuisance can be lessened, then be controlled. I can envisage the difficulty but please try.</p> <p>D. Also:</p>	

Respondent Name	Comments	Council's Response
	<p>- Please see enclosed Times clipping & my comment.</p> <p>- high pollution is increasing – unnecessarily strong or permanently on, or sited (e.g. doorsteps & back gardens) – or all three.</p> <p>Clare Gardens/Lowerwood Court, my view for 40 years, has become a blaze, some of searchlight strength. Birds sing in the early hours pitch dark 2 am. RSL's must surely learn how to say boo to selling by highlighting supplies which equate strength with efficacy.</p> <p>With all Good Wishes for the success of the SPD.</p>	