Clean Air IN LONDON

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By email to: planning@rbkc.gov.uk

14 May 2016

Dear Ms Long

Planning application for redevelopment of K1, The Knightsbridge Estate (Ref: PP/16/00423 and LB/16/00424)

I am writing on behalf of Clean Air in London (CAL) to the Royal Borough of Kensington and Chelsea (RBKC) about the planning application for the redevelopment of K1, Knightsbridge Estate (Ref: PP/16/00423 and LB/16/00424) (the Application and the Proposed Development). This letter is further to our letter dated 28 February 2016 and should be read in conjunction with it.

CAL had a constructive meeting with the applicant on Wednesday 11 May and was copied on a letter from Chelsfield to RBKC dated 13 May. **CAL is hereby withdrawing its objection to the proposed development on the basis of the undertakings and assurances given by the applicant to RBKC and CAL in its letter dated 13 May provided that any CHP unit shall be the latest generation ultra-low NOx gas turbine and properly maintained once installed (i.e. not biomass, spark ignition engine or compression ignition engine) and similarly for any gas boilers (but see below).**

However, CAL reminds RBKC of its duties described in the Robert McCracken QC Opinion (attached) to ensure that nitrogen dioxide (NO_2) concentrations are not increased significantly where limit values are expected to be exceeded. In CAL's expert opinion, an increase in annual mean concentrations of NO_2 of 0.1 micrograms per cubic metre ($\mu g/m^3$) is 'significant' in these circumstances. **Please therefore condition the development appropriately including in relation the matters highlighted below.**

Second highest NO_2 concentrations in the UK in 2020

A recent Freedom of Information request by CAL found that Defra expects Knightsbridge (the road) to have the second highest concentrations of NO_2 in the UK in 2020 and still exceed the NO_2 annual mean limit value in 2025. See:

https://www.google.com/maps/d/viewer?mid=1Pm56n7vrZ675k1H-J68dVhXyTbE

Kings College London has highlighted that many roads in central London will tend to have the highest concentrations of NO_2 in the world. See:

http://www.londonair.org.uk/london/asp/news.asp?NewsId=OxfordStHighNO2&StartIndex=31

New SPGs for the CAZ and Housing

CAL draws RBKC's attention to two SPGs published in March 2016 which are relevant in relation to this development. Some relevant sections have been highlighted below.

CAZ

Mayor Johnson published new Supplementary Planning Guidance for the Central Activities Zone on 14 March 2016. It can be seen here:

https://www.london.gov.uk/sites/default/files/caz_spg_final_v4.pdf

https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/central-activities-zone

Page 99 – para 5.78

Page 100 – para 5.7.12

"Bunhill Energy Centre and district wide heat network is a scheme led by Islington Council to provide cheaper, greener heat to homes on several estates and buildings in the Bunhill area. Initially (from 2012) fed by a CHP engine to heat over 700 homes and the local baths and leisure centres, the network is to be connected to a further 454 homes in the area, with the potential to supply a further 1,000 homes and to capture waste heat from the tube network and an electricity substation. This project received European and national grants to facilitate its delivery. The Council's ownership and management of the scheme will help to maximise benefits for the local community and energy bill savings for residents."

Housing

Mayor Johnson published new Supplementary Planning Guidance for Housing on 14 March 2016. It can be seen here:

https://www.london.gov.uk/sites/default/files/housing_spg_revised_040516.pdf

See paragraph 2.3.54:

"The final step of the hierarchy is to 'be green' by incorporating renewable energy technologies in developments. Policy 5.7 Renewable Energy seeks a further reduction in carbon dioxide emissions through the use of renewable energy generated on-site. Developers should seek to utilise the following renewable energy technologies that are considered to be technically feasible in London: energy from waste; photo-voltaics; solar water heating; wind and heat pumps. These technologies should be incorporated wherever feasible and where they contribute to the highest overall carbon dioxide emissions savings for a development proposal, subject to air quality considerations."

CAL draws your attention specifically to the efforts to use waste heat from the tube network and Mayor Khan highlighting the above project during his election campaign. See:

http://www.sadiq.london/sadiq_khan_unveils_plan_for_london_clean_energy_revolution

One of the new Mayor's first announcements was about his plans to reduce NO_2 concentrations in London. See:

https://www.london.gov.uk/press-releases/mayoral/bold-plans-to-clean-up-londons-toxic-air

Undertakings from the developer

CAL welcomes specifically the applicant's willingness to identify further means to reduce the NO_2 impacts of the development especially re-considering the use of the heat generated by TfL in the Piccadilly Line. CAL is deeply concerned that Government guidance penalises developers for the use of grid electricity to the detriment of Central London air quality and public health.

CAL urges RBKC therefore to use its best efforts to support fully the applicant in reducing NO_2 emissions at the development site to the maximum extent technically feasible. In CAL's opinion, after energy efficiency measures have been maximised, full use should be made of:

- the waste heat generated from the Piccadilly line (with any residual emissions from the tube being fully filtered before they enter the atmosphere); then
- onsite use of photo-voltaics, solar water heating, wind and heat pumps; and then
- electricity from the grid.

The use of energy that generates local emissions in one of the most polluted parts of the world for NO_2 should be: the last resort; and always subject to a requirement to use the latest technology and the maximum abatement of air pollutant emissions. I understand that developments in the City of London are now seeking to use air source heat pumps with no local gas or other emissions.

I have copied Chelsfield, Councillor Paget-Brown, the Mayor of London and Councillor Acton of Westminster City Council as interested parties given the seriousness and immediacy of the needs and opportunities highlighted in this letter.

Finally, CAL looks forward to working with relevant parties to achieve the best possible outcome from this development for air quality in Knightsbridge and more widely and as model and catalyst for other landmark developments in London.

Yours sincerely

Simon Birkett
Founder and Director

Cc:

Chelsfield, Councillor Paget-Brown, Mayor of London and Councillor Acton