

Carbon Offsetting, Basements Publication Planning Policy, February 2014, Royal Borough of Kensington and Chelsea

1. Background

- 1.1 This note has been prepared as part of the evidence base for the Publication Planning Policy on Basements February 2014. It relates to the carbon footprint of multi-storey basements and carbon offsetting.

2. Analysis

- 2.1 London Plan Policy 5.2: Minimising Carbon Dioxide Emissions (E.) states *“The carbon dioxide reduction targets should be met on-site. Where it is clearly demonstrated that the specific targets cannot be fully achieved on-site, any shortfall may be provided off-site or through a cash in lieu contribution to the relevant borough to be ring fenced to secure delivery of carbon dioxide savings elsewhere.”*
- 2.2 The Publication Basement Policy requires that the property to which the basement development relates to is upgraded to BREEAM Domestic Refurbishment ‘very good’ standards with a minimum standard of excellent in the energy category and a minimum of 80% of credits in the waste category. These standards were set based on the advice in the report ‘Evidence Base for Basements and Policy CE1: Climate Change’ by Eight Associates, July 2013. The standards consider the special historic character of the Borough and are set at a level so as not to cause harm to the historic fabric of the Borough and include a checklist for proposals related to listed buildings. Offsetting elsewhere would also need to consider these guidelines in the context of the extensive and rich historic character of the Borough.
- 2.3 The London Plan Policy 5.2 has a sequential approach for carbon offsetting. The first preference is to do this on-site and this approach is supported in the Publication Planning Policy on Basements February 2014. Given the large carbon foot-print of basements with two or more storeys as set out in the report ‘Life Cycle Carbon Analysis: Extensions and Subterranean Developments in RBKC’ by Eight Associates (February 2014), it is considered that the carbon impacts cannot be completely offset on-site. In such cases as set out in Policy 5.2 of the London Plan the shortfall could potentially be provided off-site or through a cash in lieu contribution to the Council which can be ring fenced to secure delivery of carbon dioxide savings elsewhere. However, as set out in the following paragraphs this needs to be considered in the context of the circumstances in this Borough.

2.4 The following paragraphs consider the offsetting options in turn

1. Provide offsetting off site

It is unlikely that the applicants will have several properties in their ownership which could be used to offset the carbon generated from the multi-storey basement proposal. Even in the unlikely scenario that there were other properties in the ownership of the applicant, carbon offsetting elsewhere would need to be negotiated with no guarantee of a positive outcome in every case. It is also possible that these properties are occupied by tenants or other users and it would not be viable to undertake the upgrades. Therefore this would not be a feasible or preferable option in this Borough.

2. Cash in lieu contribution

The Council has a very limited building stock in the Borough. There are no tangible plans to undertake estate regeneration in the Borough. Much of the social housing stock is owned by housing associations. It is not considered feasible to take a financial contribution and rely upon housing associations to make the necessary upgrades. Therefore taking cash in lieu is only considered to have a limited potential. There is a distinct possibility that, if a substantial pot of money was accrued, the Council would have difficulty spending it for carbon mitigation. Under these circumstances it would have to be returned to developers.

3. Conclusion

3.1 The reasoned justification to London Plan Policy 5.2 states (para 5.23) that *“the shortfall may be provided off-site, but only in cases where there is an alternative proposal identified and delivery is certain, or where funding can be pooled to support specific carbon dioxide reduction projects or programmes.”* Due to the reasons set out above it is considered that neither of the options – offsetting off-site or taking cash in lieu are realistic in this Borough.