

**THE ROYAL BOROUGH OF KENSINGTON AND CHELSEA  
MEETING OF THE COUNCIL - 8 DECEMBER 2010**

**REPORT BY THE EXECUTIVE DIRECTOR PLANNING AND BOROUGH  
DEVELOPMENT**

**ADOPTION OF THE SUBMISSION CORE STRATEGY**

Full Council is requested to consider the Inspector's Report following the independent examination and his comments in relation to the soundness of the Submission Core Strategy and to adopt the submission version incorporating the changes proposed by the Inspector.

**1.0 INTRODUCTION**

- 1.1 Full Council is requested to consider the Inspector's report regarding the soundness of the Submission Core Strategy and is recommended to adopt the submission version incorporating the changes proposed by the Inspector. Members should note that the Inspector's report is only 19 pages long and the bulk of the documentation is the appendices attached to the Inspector's report.
- 1.2 The Submission Core Strategy has stuck to its timetable for adoption despite the Planning Inspectorate delaying the process for six weeks. As a result the final proof read document incorporating all the changes has taken slightly longer to produce than originally envisaged. However, a version of the Submission Core Strategy incorporating the changes is available to members on request. Copies have also been put in the Members' room. This version shows what the document will look like, but it may be subject to very minor grammatical changes. The Inspector has confirmed that he is content for the Council to make any further minor changes to page, figure, paragraph numbering etc and to correct any spelling errors prior to adoption.
- 1.3 The Inspector's report was considered by members of the Public Realm Scrutiny Committee on the 9 November. No formal recommendations were made in light of the Inspector's comments.

**2.0 BACKGROUND**

- 2.1 Members will be aware that the 'Submission Core Strategy for the Royal Borough of Kensington and Chelsea with a Focus on North

Kensington Development Plan Document' (referred to in this report as the Core Strategy) was submitted to the Secretary Of State for examination in March this year.

- 2.2 Public hearings regarding the soundness of the document were conducted over a two week period in July this year by a Planning Inspector appointed by the Government for the purpose. His report regarding the soundness of the document (Appendix 1) has been received and he concluded that the document is **sound** subject to a modest number of changes that he directed should be made (Appendices A and C of the Inspector's report). However, the vast majority of these were suggested by the Council as part of the Public Hearings process (Appendix A) and the Inspector has only proposed a few additional changes which are binding on the Council (Inspector's Report Appendix C). Members may wish to consider what other planning measures might be put in place to mitigate the impact of any of the changes set out in Appendix C with which they are disappointed and suggest further work post adoption of the Core Strategy. All the appendices to the Inspector's report have been included with this report together with the Inspector's covering letter. Appendix B deals with minor changes proposed by the Council; proposed editorial changes; proposed changes to Chapter 32: Monitoring; proposed changes to the Policy Replacement Schedule; and to Chapter Seven. The Inspector endorsed all these changes which were suggested by the Council. The changes in Appendix B are not binding on the Council. Theoretically therefore, the Council has discretion to NOT include some of the changes. However, as the recommendations were put forward by the Council this would be highly unusual and Members are recommended to adopt the changes set out in Appendix B.
- 2.3 In his covering letter the Inspector was complimentary of the manner in which the public hearings had been run and the way that the process had been embraced by the Core Strategy team, those who appeared at the Hearings and the Programme Officer. The Inspector comments of the Core Strategy, "The Core Strategy is unusual in a number of respects. It is substantially larger, and seeks to provide a more comprehensive suite of policies and proposals than most equivalent core strategies. This necessarily, results in a complex document with the attendant difficulties of comprehension. However, it provides a uniquely local policy framework which focuses on the special characteristics of the Royal Borough and – as its title suggests – the problems it faces, most notably in the northern part of the area."

### **3.0 NEED**

- 3.1 The Core Strategy will be the principal document of the Local Development Framework and was prepared in accordance with the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended). It will largely replace the adopted Plan for the Borough, the Unitary Development Plan with alterations

since the 27<sup>th</sup> September 2007. It will provide the policy framework for almost all planning decisions in the Borough until 2028. It also provides the policy framework for any Supplementary Planning Documents (SPDs) the Council intends to produce as well as giving a clear steer on the direction that the Council intends to take, not only in terms of land use planning decisions, but also in terms of actions with other organisations.

#### **4.0 REPORT ON SOUNDNESS AND IMPLICATIONS FOR THE BOROUGH**

- 4.1 The purpose of the independent examination of the Core Strategy is set out at section 20(5) of the Planning and Compulsory Purchase Act 2004 and falls into two parts. The first is whether the submitted Core Strategy, which is a Development Plan Document (DPD), has been prepared in accordance with certain statutory requirements under the 2004 Act and the Town and Country Planning (Local Development) (England) Regulations 2004. The second part is whether the DPD is sound. In making an assessment of soundness the Inspector applied the three tests set out in Planning Policy Statement 12 – Local Spatial Planning (PPS12). These are whether the Plan is justified, consistent with national policy and effective.
- 4.2 With regard to the statutory requirements the Inspector was satisfied that the requirements had been met in all respects and it is a legally compliant document. In terms of soundness the Inspector's overall conclusion was that, with the changes recommended in his report, the Core Strategy is sound. He concluded that none of the changes are critical to the overall vision for the Borough and nor do they undermine the sustainability appraisal and participatory processes undertaken. He also endorsed the Council's corrections to the original text and the proposed minor text changes/ points of clarification put forward by the Council.
- 4.3 As stated, the changes that affect soundness are included in Appendices A and C of the Inspector's report. The changes in Appendix A are the suggestions made by the Council, either at the public hearings or as part of post- Submission changes and are therefore not considered contentious. The majority clarify the situation and produce a more robust document. This report will therefore concentrate on those changes suggested by the Inspector and set out in Appendix C. The implications of the changes will be discussed.
- 4.4 The matters and issues are raised in the order that they appear in the Core Strategy and discussed by the Inspector. The Inspector identified 11 matters on which the soundness of the Core Strategy depends.

- 4.5 In terms of **matter one** as to whether the **vision and strategic objectives** address the issues and problems facing the Borough, and whether the Strategy clearly showed how the vision will be achieved, the Inspector concluded that the vision was a comprehensive statement for the Borough. He endorsed two minor changes to the vision – the insertion of a reference to the inequality health outcomes and additional wording for an effective basis for development proposals to come forward for the Earl’s Court site. However, neither of these changes was considered necessary for soundness. He commented that the whilst the Spatial and Delivery Strategies were necessarily complex and difficult to follow, the table that the Council produced helped to signpost actions and he recommended that this should be made more widely available. He also endorsed the changes to show timescales and phasing as to when development comes forward.
- 4.6 **Matter two** deals with the **broad quanta of development** and the **Housing Trajectory**. These matters cover overall housing provision and distribution, and office and comparison retail floorspace provision (comparison retail is the name used to deal with special purchases rather than everyday essential items). In terms of provision, the Inspector noted that the Core Strategy proposes to plan for the increase in residential provision so that there will be an increase from 2011/12, including annual targets of a minimum of 600 dwellings with 200 per annum being affordable housing which aligns with the policy in the replacement London Plan – Policy 3.12. In terms of housing deliverability the Inspector noted that the greatest risk arises from the question mark over the deliverability of a Crossrail station at Kensal with a worst case scenario showing only 880 units delivered coupled with a reduced supply from windfall sites. However, he noted that the Council can achieve better accessibility to the site in other ways and given the notice of any shortfall together with the fact that Earl’s Court can deliver a significantly greater total than 500 houses, the approach was considered sound.
- 4.7 With regard to office and comparison retail provision, the Employment Land and Premises Study, commissioned on behalf of the Council, forecasts a demand of around 70,000sq m of additional floorspace for the Plan period. Objectors at the hearings argued for more office floorspace and for less. However, the Inspector acknowledged that there was no consensus for revising the quota and he left it untouched. The figure of 25,000sq m for comparison floorspace was also criticised by objectors for being based on an assumption of an annual 1.5% improvement in sales density whereas a retail needs assessment for the GLA indicated an increase in productivity in use of space of 2.2% per annum. The Inspector

acknowledged that the justification for adopting a lower figure was given in some detail in the Retail Needs Assessment. However, he welcomed the fact that the floor area forecasts were not extended by the Council beyond 2015 so that the figures could remain robust.

- 4.8 **Matter three** concerned the **Policies for Places**. The Inspector was specifically concerned with the clarity of messages that the section was intending to convey which he felt could affect the soundness of the document. However, he welcomed the Council's recommendations to improve clarity which included swapping the order of sections so that '*A Particular Focus on North Kensington*' preceded the '*Places*.' The Inspector considered that the necessary clarity had been provided by additional text and a table to clarify the nature and purpose of the chapter together with an indication of the relationship between the '*Places*' and the '*Strategic Sites*' was also welcomed. Other considerations as part of the '*Places*' were the relationship between infrastructure needs, output indicators and monitoring actions which were clarified and the infrastructure needs were tied up between the '*Places*' and the infrastructure table.
- 4.9 The Council also accepted that the relationship between the Vision for the *Place* and the Strategic Site Allocation needed to be clearly articulated and the amendments put forward by the Council satisfied the Inspector in this respect.
- 4.10 In terms of '**Keeping Life Local**' (**Matter Four**) the Inspector endorsed the Council's approach of avoiding the mention of use swaps for social and community facilities, given their complexity of delivery. He also recognised that the sequential test to protect existing facilities had merit. He noted that the 800m walking distance (equating to a 10 minute walk) had merit as it was used by NHS Kensington and Chelsea as an appropriate distance to travel to General Practitioners and was also used in the Department of Transport's '*Street Manual*'. Whilst there was criticism of the distance he concluded that until research findings pointed conclusively to a different distance, the Council was right to propose retaining the 800m for the Plan period.
- 4.11 The replacement of the notation '*local centres*' with '*neighbourhood centres*' was supported as was the amendments to the text including the acknowledgment that if post offices were recognised as a sui generis use rather than a retail use, they would be protected as a social and community facility. The Inspector therefore recognised the value of a post office as an important social and community facility. However, he was not in a position to change their retail categorisation in the Planning Use Classes Order and hence their change to another retail use without the need for planning permission.

- 4.12 **Matters five and six** dealt with **strategic site allocations** and in particular **Kensal Gasworks, Wornington Green** and **Earl's Court**. The Inspector wished to examine whether the capacity of 2,500 dwellings proposed at Kensal Gasworks was achievable given the fact that the site has a poor to moderate rating in terms of its Public Transport Accessibility Level (PTAL) and a new Crossrail station, which would improve accessibility, is not included in the Crossrail Act 2008. In addition, the evidence submitted by Transport for London (TfL) was that there was a reduced likelihood of a new station at Kensal because of the HS2 Ltd recommendation for a transport interchange at Old Oak Common.
- 4.13 Despite the uncertainty of the Crossrail station the Inspector noted that PTAL 4 (Good accessibility) could be achieved by bus based improvements and with the Health and Safety Executive Consultation Zone enforced it would still be possible to achieve 1,200 to 1,400 residential units on the site. He noted the scepticism regarding the delivery of some of the infrastructure to the site including a pedestrian bridge over the canal and bridging over the railway. However, in view of the fact that the housing trajectory assumed a very conservative estimate of 880 units to be delivered on site and the commitments of Sainsbury's and Ballymore in a Statement of Common Ground, the Inspector concluded that no changes were necessary to ensure soundness.
- 4.14 With regard to Wornington Green it was noted that a planning brief had been adopted in November 2009 with a planning application granted in March 2010 comprising details of Phase 1 and all matters reserved for Phases 2-5. In view of the fact that the Planning Brief addressed matters which concerned representors and planning obligations would deliver affordable homes and the necessary infrastructure, the Inspector did not comment further.
- 4.15 The Inspector acknowledged that the Earl's Court chapter had undergone substantial amendment prior to publication with a number of changes to Policy CA7. The principal considerations that Members should note are that a reference to '*small scale*' was inserted by the Council with regard to the retail element for Earl's Court as was a reference to '*shorter and longer term*' with regard to the impact on viability of existing centres. Other considerations were the minimum number of homes that could be included on the Strategic Site, the requirement of 10,000 sq m of office floorspace which was challenged by the developers of the site and the reference to '*national*' in respect of a cultural facility.
- 4.16 The Inspector noted that there was no formal definition of what '*small scale*' meant in any published planning documents and given

the requirement of the new centre to serve the day to day needs of the development in Policy CF1 the term '*small scale*' was neither helpful or necessary. He also considered that the term, '*at the time of the development and in the longer term*' was at variance with Planning Policy Guidance Note 4 (PPS4) which referred to a retail impact timescale of up to five years from when an application is made. On this basis the Inspector has instructed that proposed changes recommended by the Council are deleted.

- 4.17 Members should note that the above changes outlined above in paragraph 4.16 are binding on the Council. However, they are not considered to be of great significance in so far as the Supplementary Planning Document (SPD) currently being produced for the Earl's Court site with the London Borough of Hammersmith and Fulham should be able to provide appropriate detail of the scale of retail development required to service local needs.
- 4.18 With reference to the proposal by the developers to increase the housing requirement from a minimum of 500 homes to 1000 homes, the Inspector concluded that at the stage of the public hearings there were no detailed plans to show how the total could form part of an overall mix of uses or how it would relate to the remainder of the Opportunity Area Proposals. On this basis the Inspector considered that the Council was justified in adopting a cautious approach. With regard to the requirement for a minimum of 10,000sq m of office floorspace, the Inspector considered that this was justified given the Opportunity Area Status and the requirement to provide a capacity for 7000 jobs. However, he did acknowledge that it could be provided in the wider Opportunity Area rather than concentrated on the Earl's Court Strategic Site.
- 4.19 The reference to a cultural facility of '*national identity*' was amended by the Inspector to one of '*significant cultural identity*.' He considered that the original wording was unduly restrictive and the revised wording would retain Earl's Court long standing brand. The binding change by the Inspector is not considered to raise any significant implications with regard to the proposed cultural facility, it must still be significant, conform with the 'Earl's Court brand' and be of at least strategic importance.
- 4.20 **Matter seven** was concerned with the '**Fostering Vitality**' chapter. The references to retail 'need being small scale' at Earl's Court have already been discussed. The one binding change of significance is the provision of affordable shop units as part of Policy CF2. The Inspector noted that there was strong support locally for these units to support businesses and the desire to keep life local. He noted that the evidence was provided in the Report of the Commission on Retail Conservation to RBKC in May 2007 where it was

recommended that planning obligations be used to require the provision of small retail units in new developments.

- 4.21 However, this was weighed up against criticism from the retail development industry who suggested that the Policy would act as a barrier to new retail developments. Despite noting the draft policy in the new London Plan the Inspector also noted that there was no specific support for the approach in Government policy in PPS4. He concluded that there were unanswered questions with regard to viability and therefore changed the first sentence of Policy CF2 from 'require' to 'seek' the provision of affordable shops. This binding change is disappointing. However, it should be noted that the Inspector made the changes, not because he opposed the principle, but that in his view the Council had not submitted sufficient information on viability to demonstrate the policy was reasonable. Members might like to consider if further research might be commissioned to allow for a future policy to be prepared.
- 4.22 There were two significant concerns raised by objectors with regard to Policy CF5 which is concerned with office development in the Borough. These were the control of large scale offices in Employment Zones and office floorspace in town centres. In respect of large offices in Employment Zones additional evidence was provided by the Council that large office developments (those with a floorspace over 1000sqm) would change the character and function of these areas and that a smaller mix of units was required. The Inspector supported this. The Council also clarified that although no individual large scale offices would be permitted, large scale business centres would be supported if they were made up of very small, small or medium sized units. This point of clarification was also supported by the Inspector. However, he did not endorse the proposed mix of units suggested by the Council with medium sized units making up no more than 25% of the total office accommodation to prevent a mix being dominated by medium sized units at the top of their threshold. He considered the evidence to be insufficient to justify this precise target and as such it was an arbitrary justification for what would be an overly prescriptive policy and directed that the phrase should not be included in the proposed change.
- 4.23 With regard to the above binding change it may result in a poorer mix of medium sized units (300-1000sqm) in the Employment Zones, especially if the mix consists of one small or very small unit with the remainder of the units being the top of the medium sized threshold. However, taken in the round and the fact that small office units are retained and supported throughout the Borough by the Core Strategy the binding change is not considered to have a significant impact on the character of the Employment Zones or

their function. Members may wish to consider whether it would be appropriate to undertake a new Employment Zones SPD which would expand on Policy CF5, but set out why a predominance of small business uses is required. This would help strengthen the need for smaller business uses in Employment Zones.

- 4.24 In relation to the location of offices in the Borough, the original wording of Policy CF5, as submitted, was that large offices would be protected in Higher Order Town Centres and other accessible areas (defined as PTAL 4 and above). This was backed up by evidence submitted by the Council which suggested that the loss of any additional floorspace would have to be found from windfalls over the Plan period. However, the Council's proposed changes to Policy CF5 were to reduce this area to Higher Order town centres and those areas within a two minute walk of a town centre, defined as 160m. Other 'accessible areas' would therefore no longer be included for protection although they could still be considered as a suitable location for new office development. The Council considered this to be an appropriate balance between office and housing uses and given the thrust of Policy CF5 to protect offices throughout the Borough, a reasonable amendment. However, the Inspector considered that there was no clear justification for the change differentiating between the protection of existing office floorspace and the provision of new floorspace.
- 4.25 With regard to this binding change it is not considered to have a significant impact. It would have meant that some larger office buildings could have been utilised for residential purposes outside town centres, but given the fact that the impact of all policies will have to be closely monitored including housing delivery, the implications of the change will be monitored and appropriate revisions can be put forward if the evidence justifies this approach. On a positive note, the change to make it explicit that social and community uses which serve residents will be favoured above office uses in town centres was supported by the Inspector.
- 4.26 The Council's reliance on a floorspace to worker ratio of 14.7sq m for offices as opposed to the 12 sq m advocated in the new London Plan was supported by the Inspector as was the removal of Earl's Court ward from the general protection offered by Policy CF8 regarding the loss of hotels.
- 4.27 **Matter eight** concerns '**Better Travel Choices**' and the '**Engaging Public Realm**' chapters of the Core Strategy. The Inspector had little to say regarding these chapters. None of the issues discussed were considered to affect the soundness of the document although he acknowledged that the approach to cycle routes had been

adequately justified, as had the approach to heavy traffic in conservation areas.

- 4.28 **Matter nine** concerns the '**Renewing the Legacy**' and '**Respecting Environmental Limits**' chapters. Whilst the reference to 'Heritage Assets' to reflect the new terminology in PPS5 was included by the Inspector as a binding change, it did in fact reflect the intention of the Council to change the headings of Policies CL3 and CL4. With regard to Policy CL2 and high buildings, there were substantial revisions to the form, although not the content of this Policy prior to the Hearings. The Inspector accepted all of the revised wording as sound including the fact that buildings of a metropolitan scale (more than 4 times the height of their context) were not appropriate in the Borough. He also accepted that the revisions were in general conformity with the London Plan although they were locally distinctive. This approach of the Inspector is welcomed and means that the Council has a robust policy in place for high buildings.
- 4.29 Another area where support was welcomed by the Inspector was with regard to the impact on listed buildings of subterranean development. He endorsed the approach to resist subterranean development beneath listed buildings and commented that the Council had produced sufficient evidence to support the approach. He also considered that the revised supporting text regarding residential amenity was justified, as was the treatment of the London Density Matrix where context was given clear precedence over the density table.
- 4.30 With regard to the '**Respecting Environmental Limits**' chapter the Inspector pointed out that evidence for reducing carbon emissions had to be evidence based and viable. He noted that it had been suggested that the requirement under Policy CE1 to meet specific Code for Sustainable Homes/ BREEAM standards was possibly undeliverable because it was too ambitious and too prescriptive. However, he did acknowledge that two studies had been undertaken on behalf of the Council which included the viability and feasibility to which conversions can be retrofitted to meet environmental standards and also work undertaken for affordable homes and viability. He noted that Code Level 4 (Very good) was realistic on this basis. However, he did not support the requirement for developments to achieve above this level from 2013 onwards as he considered that there was no substantive evidence to support this and therefore he directed that the word '*require*' be changed to '*seek*' for Code Level 5 and 6. The subterranean policy requiring the whole property to be retrofitted to reach an 'Ecohomes Very Good' standard was left unaltered. The binding change is considered to be fair in so far as the Council did not present

evidence to support the higher levels after 2013 and therefore the higher levels were aspirations, rather than being based on robust evidence.

- 4.31 With regard to flooding it was suggested by objectors that there should be tighter control, or even a moratorium on subterranean developments; that basement development should only be permitted in areas of flood risk if passing the Exception Test in PPS25 and that the Proposals Map should show areas of flood risk from sewer flood in addition to Environmental Agency Flood Risk Zones. The Inspector did not agree with the objectors on the above points and accepted the Council's Policy on the subject, which is based on robust evidence. The Inspector acknowledged that Policy CE2 resists vulnerable development that may be subject to flooding and there was not sufficient evidence of harm to support a moratorium. The Inspector also agreed that an 'indicative' flood risk map was not satisfactory and more research was needed. However, he endorsed an early review of Policy CE2 (as recommended by the Council) when critical drainage problems had been identified accurately and also the proposed additional text in Policy CE2 to include '*areas with critical drainage problems*' for the purposes of criteria b-d. The Inspector did not support the view of Thames Water that the Council's Thames Tideway Tunnel policy was unsound.
- 4.32 In relation to **Matter 10 (Housing)** the Inspector supported the Council's intention for the detail for housing mix to be contained in a forthcoming Housing SPD and for an element of flexibility with regard to housing standards. He also supported the changes suggested by the Council in relation to affordable housing which would require developers to provide 50% from all developments exceeding the minimum floorspace and requiring justification where this was not proposed.
- 4.33 The use of a floorspace threshold, rather than the number of units was also supported by the Inspector as a trigger for affordable housing and he considered the Core Strategy sound in this respect. With regard to Estate Renewal he considered that the Council should '*require a guarantee that all existing tenants have an opportunity to a home*' rather than simply *requiring* it as it may be outside the direct control of the planning system. This appears to be a sensible amendment. There were no matters in '*Diversity of Housing*' chapter which were considered unsound.
- 4.34 Finally **Matter 11** dealt with ***Infrastructure/ Monitoring, Risks and Contingencies and the Proposals Map***. The Inspector acknowledged that the Infrastructure Delivery Table needs updating and the table included in the Core Strategy was only a 'snapshot'.

He also supported minor changes to the text and Proposals Map to ensure that it was up to date and accurate.

- 4.35 In conclusion the Core Strategy was found to be a sound document. There are very few binding changes imposed on the Council, and those changes which have been made do not go to the heart of the document in terms of its intent.

## **5.0 OPTIONS**

- 5.1 Full Council has no option but to accept the binding changes set out in Appendices A and C of the Inspector's report if it wishes to adopt the Core Strategy. Members may wish to examine if matters that are of disappointment can be addressed in other ways. Members may also wish to examine the Inspector's report and comment as to whether the binding changes have any significant planning policy effects for the Borough. Regarding the non-binding changes set out in Appendix B Full Council has the theoretical option of not endorsing one or more of these changes. However, given that they have been offered by the Council to the Inspector this is not recommended.

## **6.0 WHAT HAPPENS NOW**

- 6.1 The Inspector's report and recommendations have now been published on the Council's website. In view of the fact that the Inspector has found the Core Strategy sound subject to some modifications it now carries significant weight for planning decisions and after adoption will form part of the Development Plan for the Borough alongside the Greater London Authority London Plan. A final version of the document has now been produced incorporating all the changes. In accordance with regulation 36 of the Town and Country Planning (Local Development) (England) Regulations 2004 a formal adoption process must be followed which starts as soon as reasonably practical after the Council adopt the Core Strategy. This will involve a period of publicity with an adoption statement being published together with details of the places and times where the Core Strategy can be inspected. The Unitary Development Plan (which together with the London Plan comprises the current development plan for the Borough) will be largely superseded after the Core Strategy is adopted although there are a limited suite of policies that are being retained for the time being. These will have the same weight as the Core Strategy policies.

## **7.0 FINANCIAL IMPLICATIONS**

7.1 There are no direct financial implications for the Council in the document.

## **8.0 LEGAL IMPLICATIONS**

8.1 The Director of Legal Services has been consulted as part of this report. The Inspector has concluded that the Core Strategy is sound subject to a number of specified modifications. The effect of s23 of the Planning and Compulsory Purchase Act 2004 is that the Council can adopt the Core Strategy as modified by the Inspector. It cannot be adopted otherwise. On this basis the binding changes proposed by the Inspector must be accepted for the Core Strategy to be adopted.

## **9.0 PERSONNEL IMPLICATIONS**

9.1 There are no personnel implications in the DPD.

## **10.0 EQUALITIES IMPLICATIONS**

10.1 Equalities implications were considered as part of the Environmental Impact Analysis (EIA) of the Core Strategy undertaken by the Council and were the subject of a separate report considered by the Inspector.

## **11.0 RECOMMENDATION**

11.1 It is recommended that Full Council considers the contents of the Inspector's report and adopts the submission version of the Core Strategy incorporating the changes proposed by the Inspector.

Jonathan Bore  
Executive Director Planning and Borough Development

**Background papers:** The Inspector's Report and appendices submitted to the Council of the Royal Borough of Kensington and Chelsea dated 29 October 2010.

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