



Proposed Submission Core Strategy for the Royal Borough of Kensington and Chelsea with a focus on North Kensington

Sustainability Appraisal Report

Prepared for the Royal Borough of Kensington and Chelsea





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October 2009

Sustainability Appraisal of the Proposed Submission Core Strategy for the Royal Borough of Kensington and Chelsea with a focus on North Kensington

Revision Schedule

Proposed Submission Core Strategy for the Royal Borough of Kensington and Chelsea with a focus on North Kensington SA Report

October 2009

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02	October 2009	Pre-submission Draft SA Report	Vanessa Barri Senior Environmental Consultant	Steve Smith Associate	
			Liz Clarke Assistant Environmental Consultant		

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Scott Wilson

6 – 8 Greencoat Place London SW1P 1PL

Tel 020 7798 5000 Fax 020 7798 5001

www.scottwilson.com

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1 Introduction

1.1.1 Scott Wilson was commissioned by the Royal Borough of Kensington and Chelsea ('the Council') to undertake an independent Sustainability Appraisal (SA) of the Borough's pre-submission Core Strategy. SA seeks to identify the economic, social and environmental impacts of a plan and suggest ways to avoid or minimise negative impacts and maximise positive benefits. The Council has undergone a number of stages in the preparation of the Core Strategy, and Scott Wilson has worked alongside the Council to ensure that sustainability considerations have been to the fore as they have considered different ways forward (the 'options'). This report sets out the findings of the SA of the 'pre-submission' Core Strategy, known as the Proposed Submission Core Strategy for the Royal Borough of Kensington and Chelsea with a focus on North Kensington.

1.2 SEA/SA

- 1.2.1 Strategic Environmental Assessment (SEA) involves the systematic identification and evaluation of the environmental impacts of a strategic action (e.g. a plan or programme). In 2001, the EU legislated for SEA with the adoption of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive'). The Directive entered into force in the UK on 21 July 2004 and applies to a range of English plans and programmes including Local Development Frameworks (LDFs). A LDF is a folder of Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs) that together outline the approach to planning that will be followed within a local authority (e.g. Royal Borough of Kensington and Chelsea) area.
- 1.2.2 The Government's approach is to incorporate the requirements of the SEA Directive into a wider process that considers economic and social as well as environmental effects. This combined process is known as 'Sustainability Appraisal (SA)'. Under the Planning and Compulsory Purchase Act 2004 (enacted through the Town and Country Planning Regulations, 2008), local authorities must undertake SA of their DPDs. SA is therefore a statutory requirement for LDFs along with SEA. In November 2005, the Government published guidance which Scott Wilson adhere to on undertaking SA of LDFs incorporating the requirements of the SEA Directive ('the Guidance').
- 1.2.3 The Guidance advocates a five-stage approach to undertaking SA (see **Figure 1**). Stage A of the process has been carried out, with the Scoping Report being published in June 2005 and a SA Update Report incorporating an update to Stage A produced in February 2009.

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1.3 This Report

- 1.3.1 The main aim of this report is to document Stage B of the SA process. In doing so it fulfils the requirements of Stage C.
- 1.3.2 Stage B of the SA process involves the main body of appraisal work and consists of five key tasks:
 - B1 Testing the DPD Objectives against the SA Framework;
 - B2 Developing and refining options;
 - **B3** Predicting and assessing effects;
 - **B4** Identifying mitigation measures; and
 - B5 Developing monitoring proposals.
- 1.3.3 Stage B has been an iterative process. The Council first developed options for the Core Strategy for public consultation in November 2005. At this stage an Interim SA Report was published to accompany the Core Strategy Issues and Options document at formal consultation.
- 1.3.4 Site Specific Allocations were consulted on in June 2006, as was an Interim SA Report.
- 1.3.5 The North Kensington Area Action Plan options were accompanied by an Interim SA Report for consultation in February 2008. At this time the Council also consulted on a second set of options in the Core Strategy Interim Issues and Options document.
- 1.3.6 Following this, the Council developed a 'Towards Preferred Options' document that brought together the Core Strategy and the North Kensington Area Action Plan. This document underwent public consultation between July and October 2008.

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- 1.3.7 In February 2009 a SA Update Report was produced that looked to identify how the SA so far had influenced the preparation of the plan. It also provided an update to the Scoping Report that was prepared in 2005 and reported any suggested changes to the SA framework to undertake the appraisal of the combined plan. This document was made available to stakeholders for comment in February 2009 and published in July 2009.
- 1.3.8 Scott Wilson was presented with an early draft of the submission plan in May 2009, at which point a high level appraisal and 'SA Commentary' was prepared. This Report considered the sustainability implications of the emerging strategic policies. It was thought that there were benefits of undertaking this appraisal of the strategic policies at an early stage to assist the Council as they finalised the strategic policies. In June 2009 a more detailed appraisal and 'SA Commentary' were prepared for the strategic objectives; strategic sites; places and strategic policies prior to finalisation of the plan. A draft SA Report was also prepared in July 2009 based on the 'for LDFAG 15th June 2009' version on the Core Strategy. Several further SA iterations of the developing Core Strategy were undertaken and recommendations provided to the Council during September and October 2009. All of these appraisals allowed time for the Council to consider and incorporate appraisal findings in the plan. The Council have now finalised the presubmission **Proposed Submission Core Strategy for the Royal Borough of Kensington and Chelsea with a focus on North Kensington**.
- 1.3.9 This SA Report documents the appraisal of the pre-submission Core Strategy.
- 1.3.10 **Figure 2** shows the points at which Scott Wilson has provided SA input.

Figure 2: History of the SA work undertaken by Scott Wilson



1.3.11 The remainder of this SA Report is structured as follows:

Chapter 2	Sets out a summary of Stage A of the SA Process
Chapter 3	Further introduces the Core Strategy and the approach to Stage B (B2)
Chapter 4	Describes the appraisal methodology
Chapter 5	Summarises the main appraisal and includes recommendations and mitigation measures (SA Stage B (B1, B3 and B4))
Chapter 6	Makes conclusions regarding the findings of the appraisal and sets out monitoring proposals (SA Stage B (B5)) that should be considered by the Council.
Chapter 7	Sets out the next steps in the SA / plan-making process
Appendices	Set out the detailed appraisal findings.

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Meeting the requirements of the SEA Directive

1.3.12 The SEA Directive sets out certain procedural elements that must be followed. In particular, the SEA Directive requires the preparation of an 'Environmental Report' on the implications of the plan or programme in question. This report incorporates the information that must be included in the Environmental Report. An SEA roadmap, demonstrating how this report conforms to the Directive is shown in **Table 1**. In order to retain clarity, the stages of the process that address the requirements of the SEA Directive are also clearly highlighted in this report. Furthermore, a SEA/SA checklist is included as **Appendix 1**.

Table 1: SEA road map

Environmental Report requirements ¹	Section of this report
(a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;	Chapters 1, 2 and 3
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Chapter 2
(c) the environmental characteristics of areas likely to be significantly affected;	Chapter 2
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC (The Birds Directive) and 92/43/EEC (The Habitats Directive);	Chapter 2
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	Chapter 2
(f) the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Chapters 5 and 6
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Chapters 5 and 6
(h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapters 3 and 4
(i) a description of the measures envisaged concerning monitoring in accordance with Article 10;	Chapter 6
(j) a non-technical summary of the information provided under the above headings.	Non-technical Summary (separate volume)

¹ As listed in Annex I of the SEA Directive (Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment)

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2 Stage A Findings

2.1 Introduction

2.1.1 Stage A of the SA process involved gathering evidence regarding the sustainability baseline and sustainability context in the Royal Borough of Kensington and Chelsea (RBKC). This evidence is also available to inform the subsequent appraisal of the LDF. In particular, from the consideration of evidence a number of sustainability objectives for Kensington and Chelsea emerged. These objectives are the key benchmarks against which the sustainability effects of the LDF can be assessed. Together, the objectives can be considered to be the 'framework' for the appraisal. The framework and evidence base for the SA of the LDF are documented in a Scoping Report, which was published in September 2005 and the SA Update Report prepared in February 2009 (published July 2009). A brief overview of the key findings from the Scoping Report and SA Update Report is presented below. This includes a brief summary of the sustainability implications of further evidence that has become available since the publication of the Scoping Report.

2.2 A1 – The sustainability context

- 2.2.1 Task A1 of the scoping process involved establishing the sustainability context that should influence the LDF preparation, i.e. the other policies, plans, programmes, strategies and initiatives that identify sustainability opportunities and challenges of relevance to the LDF. Establishing the sustainability context helps to identify sustainability issues in the RBKC (see SA Task A3 below).
- 2.2.2 The requirement to undertake review of the sustainability context arises from the SEA Directive:

The 'Environmental Report' required under the SEA Directive should include:

"an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes"

and

"the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation"

(Annex 1(a) and (e))

2.2.3 Some of the key messages to emerge from the review are set out in **Table 2**.

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Table 2: Key messages for the LDF identified in the Scoping Report

The LDF should seek to...

Environment

Biodiversity & Open Space

Conserve and enhance biodiversity. In particular, the protection of all statutory nature conservation sites as well as focusing on biodiversity in the wider environment, connectivity and the provision of new habitats.

Promote the conservation of biodiversity and the enhancement of biodiversity conservation.

Protect open space and sports and recreational facilities of high quality / value to the local community.

Consider the Borough's Environmental Policy Statement Objectives.

Reflect the 7 strategic objectives in the Borough's Tree Strategy.

Townscape

Promote good design.

Air Quality and Pollution

Where appropriate, invoke the 'precautionary principle' in relation to potentially polluting development.

Locate businesses in appropriate areas to service their transport needs and away form areas sensitive to any types of pollution impact.

Reduce pollutant emissions and enhance air, land and water quality.

Permit potentially noise generating developments provided that they are in appropriate areas to limit impacts on sensitive receptors.

Include policies and objectives with the aim of improving air quality and allocating development according to its effect on air quality.

Acknowledge the targets that need to be met as part of the AQMP and the national targets. Policies should reflect the sources of Air Pollution (motor vehicles, commercial and residential energy uses) and make attempts to address these in future developments and any existing areas within the Borough.

Land and Waste

Options will need to be identified for the disposal, minimisation and treatment of waste.

Reuse urban land and buildings.

Despite constraints, waste management and disposal is a key area where the Borough can improve.

Climate Change and Flooding

Develop renewable energy sources and where possible, incorporate renewable energy projects in new developments.

Endeavour to reduce greenhouse gas emissions and adapt to climate changes already underway.

Promote more sustainable drainage systems where appropriate.

Development should not be provided in areas at high risk from flooding.

Cultural Heritage

Preserve and enhance the Royal Borough's unique and rich cultural heritage including Conservation Areas, Listed Buildings and sites of Archaeological value. Promote good design.

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Economy

Economy and Employment

Where possible, promote 'win-win-win solutions' that advance economic, social and environmental concerns. In some instances trade-offs between competing objectives may be necessary.

Enhance consumer choice.

Upgrade tourism facilities, promote diversity and reduce seasonality, and ensure that tourist activity is not detrimental to residential amenity.

Use existing cultural and historical attributes to encourage sustainable forms of tourism. Introduce policies that reflect the economic characteristics of the Borough.

Transport

Concentrate major trip generators where there is a choice of means of transport other than the car.

Reduce car dependence by facilitating more walking and cycling and improving public transport linkages.

Social

Housing

Create mixed communities.

Avoid developments with <30 dwellings per hectare.

Ensure that 'Affordable housing and public transport improvements should generally be given the highest importance' with priority given to other areas such as 'learning and skills and health facilities and services and childcare provisions'.

Use the Borough's Housing Strategy key principles in creating policy.

Despite the high house prices within the Borough, ensure the needs of the Borough in terms of affordable housing are accommodated.

Ensure that the underlying causes of housing problems are address and suggest suitable mitigation where needed being mindful of the character of the area. Additionally, the bigger picture of housing in West London should be included.

Health, Crime and Social Equity

Include a robust and realistic monitoring framework, carrying out adequate consultation with consultation bodies and stakeholders. This is also relevant to the SA.

Regenerate deprived areas.

Promote social inclusion.

Fulfil residents "wants" in each sector covered by the Borough's Future of Our Community document.

Concentrate on crime sectors that are highlighted as priorities, and should aim to reduce antisocial behaviour as well as other forms of crime in accordance with the Community Safety Strategy.

More recent policy context

2.2.4 The policy evidence base has been added to considerably since the publication of the Scoping Report in September 2005. Summarised in **Table 3** are some of the key implications from recent policy documents reviewed in the SA Update Report.

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Table 3: Implications of post September 2005 policy context

Habitats Directive (92/43/EEC) – update to UK 'The Conservation (Natural Habitats, &c.) (Amendment) Regulations(2007)

The amended Regulations transpose into English law the requirement to carry out a Habitats Regulations Assessment (HRA) / Appropriate Assessment (AA) for land use plans including Local Development Documents (LDDs), such as Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs).

European Landscape Convention (2000)

The convention aims to promote landscape protection, management and creation, and to organise European co-operation on landscape issues. It also encourages the integration of landscape into relevant areas of policy.

Specific measures of the convention include: raising awareness of the value of landscapes; promoting landscape training and education; active participation of stakeholders; and setting objectives for landscape quality.

PPS1: Supplement: Planning and Climate Change (2007)

Local Planning Authorities (LPAs) should consider the likely performance of LDDs on mitigating climate change and in adapting to the impacts of likely changes to the climate. This should be a key part of the Sustainability Appraisal (SA), which should be used to identify and evaluate possible tensions or inconsistencies between current or likely future, baseline conditions.

PPS3: Housing (2006)

Planning Policy Statement 3: Housing (PPS3) underpins the delivery of the Government's strategic housing policy objectives and the goal to ensure that everyone has the opportunity to live in a decent home, which they can afford, in a community where they want to live.

PPS12: Local Spatial Planning (2008)

Spatial planning plays a central role in the overall task of place shaping and in the delivery of land uses and associated activities. PPS12 sets out how policies should be prepared and what should be taken into account by LPAs in preparing LDDs.

Good Practice Guide on planning for Tourism (2006)

Highlights the key objectives which LPAs should take into account when planning for tourism in order to ensure that the characteristics, the trends and the needs within the tourism industry are considered in the development of plans and planning decisions.

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PPS25: Development and Flood Risk (2006)

Planning Policy Statement 25 (PPS25) sets out Government policy on development and flood risk. Its aims are to ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas of highest risk. Where new development is, exceptionally, necessary in such areas, policy aims to make it safe, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.

Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007)

Local authorities are important in tackling air quality issues. Local authorities will continue to periodically review and assess the current and likely future, air quality in their areas against the national air quality objectives.

Encroachment Policy for Tidal Rivers and Estuaries (2006)

Any proposed development close to tidal rivers and estuaries will require planning permission from the local authority and flood defence consent from the Environment Agency.

The London Plan (consolidated with alterations since 2004) (2008) and draft replacement London Plan (2009)

The London Plan integrates the physical and geographic dimensions of the Mayor's other strategies for the development of a framework for land use management and development in London. It also provides the London-wide context for all London boroughs when developing their local planning policies, which all boroughs DPDs must be in 'general conformity' with.

A selection policies relevant to Kensington and Chelsea are:

POLICY 2A.7 AREAS FOR REGENERATION

North Kensington is identified as an area for regeneration.

POLICY 3A.2 BOROUGH HOUSING TARGETS

Kensington and Chelsea's expected targets for housing delivery are 3,500 new homes over a ten year period 2007/08 to 2016/17, with an annual monitoring target of 350 new homes.

POLICY 3D.4 DEVELOPMENT AND PROMOTION OF ARTS AND CULTURE

This policy aims to identify, protect and enhance Strategic Cultural Areas and their settings. The South Kensington museums complex is a Strategic Cultural Area.

POLICY 5F.1 THE STRATEGIC PRIORITIES FOR WEST LONDON

Some of the priorities are to promote London's world city role – Knightsbridge and South Kensington museums complex and an area for regeneration in parts of North Kensington.

The Mayor has published the Draft replacement London Plan in October 2009 for consultation. Some of the changes that are relevant to the Borough include:

- The designation of Earl's Court and West Kensington and Kensal Canalside as Opportunity Areas.
- The Borough ten year housing supply target is proposed to increase to 5,850 units between 2011 and 2021 (585 net additional dwellings per annum).
- A greater emphasis on the design quality of new residential development alongside the introduction of minimum space standards.
- The 50% strategic affordable housing target is replaced by a flexible policy which 'seeks to

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maximise' affordable housing provision with an average target of 13,200 more affordable homes per year in London.

- In terms of planning obligations priority is given to securing affordable housing, Crossrail and other transport improvements.
- Greater flexibility in tackling climate change, proposing that 25% of the heat and power used in London should be generated through the use of decentralised energy systems by 2025.
- A target of zero carbon for all new major residential developments and non domestic buildings after 2016 and 2019 respectively.

The Mayor's Economic Development Strategy (2005)

This Strategy is produced on behalf of the Mayor of London by the London Development Agency (LDA) and it sets out the action plan for all those involved in London's economy and concerned with its success. The key aim is to develop London as an exemplary sustainable city with continued economic growth, social inclusivity and excellent environmental management; a good place to live, work, study and visit.

The London Rivers Action Plan (2009)

The London Rivers Action Plan (LRAP) details restoration opportunities and practical guidance to take forward London's river restoration strategies. The key aims of the LRAP are to: improve flood management using more natural processes; reduce the likely negative impacts of climate change; reconnect people to the natural environment through urban regeneration with better access for recreation and improved well-being; and to enhance habitats for wildlife.

Draft River Basin Management Plan (Thames River Basin District) (2009)

The Draft River Basin Management Plan (Thames Region) is prepared under the Water Framework Directive by the Environment Agency. The plan focuses on the protection, improvement and sustainable use of the water environment including surface freshwaters, groundwater, coastal waters and all estuarine waters. The plan also covers planning for future development including considering water quality, water resources, biodiversity and river restoration and surface water run-off.

Thames Estuary 2100 Plan (2009)

Thames Estuary 2100 (TE2100) plan looks at management of flood risk for London and the Thames Estuary in the short (25 years), medium (the following 40 years) and long term (to the end of the Century). In particular the plan considers how tidal flood risk is likely to change with climate change and with increases in population and development in the floodplain.

Air Quality Action Plan Consultation (2008)

The Royal Borough suffers from poor air quality caused mainly by two pollutants: NO₂ and PM10 from road vehicles and heating buildings. The Air Quality Action Plan consultation sets new targets and proposes actions to improve air quality in the Royal Borough in particular to these pollutants and to feed into the new action plan.

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Local Implementation Plan (2007)

The Local Implementation Plan sets out the Council's proposals to implement the Mayor's Transport Strategy over the coming years across the Royal Borough.

Environment Strategy (2006)

Identifies the key priority areas for action in the Borough and where the most tangible difference can be made to achieving environmental sustainability. Also contains action plans and sets new targets.

Local Development Scheme (2008)

This is the programme for preparing the LDF over the next 3 years for the Borough. It proposes to fulfil four priorities for the LDF within specified time limits.

Community Strategy Update (2008)

The Community Strategy provides a future vision for the Borough's local community. This strategy is seeking to understand the local needs and opportunities and make plans for how these will be delivered aiming at improving the quality of life in the Royal Borough. The strategy is organised around eight themes dealing with aspects of life in the Royal Borough with a set of aims and objectives arranged around the themes.

Cabinet Business Plan 2009/10 to 2011/12: Proposals for Discussion (2009)

The Cabinet Business Plan sets out the Cabinet's policy priorities and budget proposals for the Council between the 2009/2010 and 2011/2012 financial years. The Cabinet Business Plan is updated annually.

Crime and Community Safety Plan 2008-2011 (2008)

This Crime and Community Safety Plan provides an account of the locally identified crime and anti-social behaviour priorities and details the goals and the measures/actions to tackle them in relation with the government's priorities and identifies partnerships for achieving these goals. The six local priority areas identified for action are: acquisitive crime, violence, street crime, the misuse of drug and alcohol and anti-social behaviour.

The Local Biodiversity Action Plan 2007-2011 (2007)

Protecting and enhancing locally important species and habitats and contribute to ecological sustainability and quality of life in Kensington and Chelsea. Habitat action plans are targeted and designed to benefit a wide range of plant and animal species. Since green space is limited in the Borough, there is both a need and opportunity to consider biodiversity in less obvious sites.

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Ten Year Parks Strategy 2006/2015 (2006)

There is limited amount of open space in the Borough. This Strategy aims at protecting and bringing the Royal Borough's existing parks up to a consistently excellent standard due to the significant constraint of increasing open space. The Strategy proposes to improve the quality of existing parks by improving the management of parks, providing a wider range of facilities and enhancing the experience of all legitimate park users.

Play Strategy 2006/2009 (2006)

The Play Strategy highlights the importance of play in children's development. The aims are to maximise the use of parks and open spaces, as well as, other play opportunities, provide good quality and safe play opportunities and ensure accessibility for all children in the Borough.

Draft Strategic Flood Risk Assessment (2008)

The Draft Final SFRA for Kensington, Chelsea, Hammersmith and Fulham contains recommendations for how flood risk should be managed and reduced within the Borough. The SFRA focuses on existing site allocations within the Borough but also sets out the procedure to be followed when assessing sites for future development to assist with spatial planning.

For RBKC, Flood Zone 1 exists in the majority of the Borough, including all the area north and some of the area to the south of the Kings Road. Flood Zone 1 equates to a flood event with less than a 0.1% chance of occurring each year (1 in 1000 year event).

The extent of Flood Zone 2 within the Borough is mostly the same as Flood Zone 3 with a few areas where it extends a little further, areas like the Westfield Park, Chelsea Manor Street and Christchurch Street. Flood Zone 2 equates to a flood event which has a between a 0.1% and 0.5% chance of each year (between a 1 in 1000 and 1 in 200 year event).

The extent of Flood Zone 3 covers a small portion of the Borough. Flood Zone 3 mainly consists in the areas adjacent to the Cheyne Walk and the Chelsea Embankment with wider extents around The Royal Hospital and Gardens, Ashburnham Road, Cremorne Road, Chelsea Manor Street and Christchurch Street. Flood Zone 3 equates to a flood event with a greater than a 0.5% chance of occurring each year (1 in 200 year event).

There are effectively no areas of functional floodplain within the Borough, however the tidal foreshore exposed each tide should be protected as this plays an important role in the functioning of the Tidal Thames.

Draft Strategic Housing Market Assessment (2009)

There is estimated to be an annual need for 3,663 affordable units in Kensington and Chelsea.

In terms of the type of affordable accommodation required, further analysis suggests that 14% could be intermediate (if priced at the 'usefully affordable point') and the remaining 86% social rented. Almost three-quarters of the intermediate requirement is for intermediate-rented housing. Households in need in the North and North West of the Borough house price areas are least likely to be able to afford an intermediate housing solution.

An analysis of net need for affordable housing by bedroom size suggests that more than 40% of the net need is for studio or one bedroom accommodation, almost a third for two bedroom accommodation and almost 30% for three and four bedroom accommodation. The need relative to supply is greatest for larger (three and four bedroom) accommodation.

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Employment Land Study (2007)

The analysis of the local economy in the Study identified many positive features, but three apparent deficiencies in RBKC:

- There is a concentration of socio-economic disadvantage in the North Kensington wards.
- Jobs located in Kensington and Chelsea on average are relatively low-paid; it seems that high-skilled, high-earning residents typically commute to work out of the Borough, largely to office jobs, while low skilled workers commute into the Borough, largely to jobs in consumer services such as retail and catering.
- While the Borough has a positive labour market balance it provides more jobs than it has working residents this balance has probably been deteriorating, due to the resident population growing faster than workplace employment.

The current UDP addresses the first deficiency.

In the new LDF, the Council may choose to correct the second deficiency, by encouraging higher-paid, higher-skilled jobs also to locate and remain in the Borough. With regard to labour market balance, the Council's scope for action is limited.

Kensington and Chelsea is home to specialist clusters in publishing and media and creative industries. The Council might consider an objective of supporting and encouraging these clusters thorough its planning policies.

The Employment Land Study has estimated a minimum requirement of 114,000 sq m of office/B1 space between 2001 and 2021 and a maximum loss of 73,000 sq m of industrial/warehousing space over the same period.

Since there is no new development land in Kensington and Chelsea, and little or no land is likely to be transferred to employment land for other uses, the management of the existing stock is the main issue for the LDF.

All employment development in the Borough is likely to be redevelopment, mostly of existing employment sites. Much of this development is likely to be in mixed-use schemes.

The Study also suggests an approach to monitor and review employment land policies.

2.3 A2 – The sustainability baseline

2.3.1 The second element of collating evidence involves a review of the sustainability baseline. The distinction between what is 'context' and what is 'baseline' is in some instances blurry, although the baseline review is distinguished by a focus on collecting relevant quantitative information where possible. Again, the aim of the baseline review is to help identify sustainability issues in the RBKC (see SA Task A3 below), and it can also suggest indicators and thresholds that can aid the quantitative assessment of effects (where this is possible). The baseline review is also important in terms of suggesting appropriate monitoring indicators.

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2.3.2 The SEA Directive's requirements in relation to baseline information are:

The 'Environmental Report' required under the SEA Directive should include:

"the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme"

"the environmental characteristics of areas likely to be significantly affected"

(Annex 1(b) and (c))

2.3.3 Set out in **Table 4** is a brief review of the sustainability baseline in the RBKC. This section provides an introduction to the Borough's environment, economy and community; as well as a brief analysis of how the Borough might look in the absence of the Core Strategy (the likely future baseline under a business-as-usual scenario).

Objective	Key information / trends
Biodiversity	There is a significant biodiversity resource in Kensington and Chelsea. There are 27 Sites of Importance for Nature Conservation (SINCs) that have been designated. There were significant losses in the period 1993 – 2002 and despite effort to create habitat as compensation, the issue of the difficulty of creating like for like habitats, and the neglect of other sites leads the report ² to site the situation as "worrying".
	Two strategically important waterways provide boundaries to the Borough. In the north the Grand Union Canal (Paddington Arm) supports a variety of bank-side wildlife and aquatic species. Adjacent to the Canal is Kensal Green Cemetery, the largest area of continuous green-space in the Borough and has some of the most flower rich unimproved grasslands in London. In the south, the River Thames, which includes Chelsea Creek, provides an intertidal habitat and a valuable fish breeding ground, which in turn attracts many birds to the area. Additionally, Holland Park contains extensive areas of mature woodland, grassland and water habitats with wide diversity of species. There are many smaller sites within the Borough that play a valuable role in the biodiversity resource. Sites such as the Chelsea Physic Garden, Brompton Cemetery, Kensington Gardens, private gardens such as Ranelagh Gardens and the Ladbroke Grove Garden Complex and school wildlife gardens all provide a place for both native and ornamental species. In addition, the more strategic sites such as the River Thames, Grand Union Canal, and the railway lines that dissect the Borough create wildlife corridors.
Crime	In the period 2006/7 to 2007/8, there were notable decreases in domestic burglary offences (-21.6%), common assaults (-23.1%), and personal robbery offences (-17.9%). Vehicle crimes decreased 7.2% and have shown significant reductions over the four previous years. Sexual offences between 2000/01 and 2007/08 have shown an overall increase of 9.7% and an average annual change of 1.2%. The same period showed an overall decrease in burglary (-43%), burglary from dwelling (-135%), theft of a motor vehicle (-161%) and theft from a motor vehicle (-22%). The total notifiable offences in the Royal Borough of Kensington and

Table 4: Summary of key baseline information and trends

² RBKC (2004) Local Biodiversity Action Plan 2004-2006. Royal Borough of Kensington and Chelsea

 Chelsea have decreased from the period 2001 to 2004. There have been greater areas of reduction in certain crime demographics, namely burglaries and violent crime which have decreased at a rate higher than the target of 15% reduction. This compares favourably with London crime reduction rates of 1.5%. The indices of Deprivation Domain for Crime, highlights Super Output Areas (SOA) that lie within ward boundaries that are within the 20% most deprived in England. These statistics have improved between 2004 and 2007: the number of SOAs within 20% most deprived in England decreased from 26 to 15. The wards with the most crime are concentrated in the north of the Borough, in the wards of Golborne, Colville, Notting Barns and Pembridge. Economy There has been a growth in the number of people of working age in the Royal Borough of Kensington and Chelsea from 114,710 in 2001 to 123,700 in 2007. This is a higher percentage of the population (69.3%) than for London (69.9%) and the UK (62.2%). A 38.5% increase in employment occurred between 1999/2000 and 2007/2008. The proportion of people of working age in employment in January-December 2007 and July 2007-June 2008 increased from 67.1% to 67.9%. This is lower than for London (69.8% and 70.6%) and for the England (74.4% Jan-Dec 2007) and the UK (74.5% July 2007 – June 2008). This figure has varied in the Borough over the last 10 years, from a high of 88.7% in March 2000-February 2001, to a low of 61.5% in April 2006-March 2007. The unemployment rate, as measured by claimants of job seekers allowance, compares well with London, being below the average, and claimants experienced a downward trend between 2000 and 2005 experiencing a 34% drop. Claimant count with rates dropped significantly between 2006 and 2008. Number of claimant scenaries form 10.2009, and the UK (74.7%) and increased by £76 between 2007 and 2008. Percentage of low pay for the Borough (88.2%) is lower than for London (12%) and th	Objective	Key information / trends
Colville, Notting Barns and Pembridge.EconomyThere has been a growth in the number of people of working age in the Royal Borough of Kensington and Chelsea from 114,710 in 2001 to 123,700 in 2007. This is a higher percentage of the population (69.3%) than for London (66.9%) and the UK (62.2%).A 38.5% increase in employment occurred between 1999/2000 and 2007/2008. The proportion of people of working age in employment in January-December 2007 and July 2007-June 2008 increased from 67.1% to 67.9%. This is lower than for London (69.8% and 70.6%) and for the England (74.4% Jan-Dec 2007) and the UK (74.5% July 2007 – June 2008). This figure has varied in the Borough over the last 10 years, from a high of 68.7% in March 2000-February 2001, to a low of 61.5% in April 2006-March 2007. The unemployment rate, as measured by claimants of job seekers allowance, compares well with London, being below the average, and claimants experienced a downward trend between 2000 and 2005 experiencing a 34% drop. Claimant count with rates dropped significantly between 2006 and 2008 to increase again in the end of 2008. Number of claimants remains lower than for London and the UK (respectively, May 2008: 1.7%, 2.5%, 2.1%, and December 2008: 2.0%, 3.2%, 3.0%).In 2007, average gross weekly earnings for the Borough (£862.4) were higher than for London (£580.8) and the UK ((13.1%). Although this figure has decreased since the 1990s, it has increased in most recent years. Levels of GVA per capita increased between 1995 and 2004 by 55.6% in RBKC to £88,563, and remain at a significantly higher level than in London and the UK. (Although job density has decreased in RBKC from 1.34 in 2001 to 1.23 in 2003, it remains higher than for London (1.02) and the UK (0.88).		 been greater areas of reduction in certain crime demographics, namely burglaries and violent crime which have decreased at a rate higher than the target of 15% reduction. This compares favourably with London crime reduction rates of 1.5%. The indices of Deprivation Domain for Crime, highlights Super Output Areas (SOA) that lie within ward boundaries that are within the 20% most deprived in England. These statistics have improved between 2004 and 2007: the number of SOAs within 20% most deprived in England
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the 20% most deprived in England. These statistics have improved between 2004 and 2007: the number of SOAs within 20% most deprived in England decreased from 26 and 23 to 19 respectively. The wards with the most income deprivation are concentrated in the wards of St Charles, Golborne, Notting Barns, Colville, and Cremorne. The wards with the most employment deprivation are concentrated in the wards of Golborne, Notting Barns, Norland, and Redcliffe. The recent Employment Land Study in the analysis of the local economy		Super Output Areas (SOA) that lie within ward boundaries that are within the 20% most deprived in England. These statistics have improved between 2004 and 2007: the number of SOAs within 20% most deprived in England decreased from 26 and 23 to 19 respectively. The wards with the most income deprivation are concentrated in the wards of St Charles, Golborne, Notting Barns, Colville, and Cremorne. The wards with the most employment deprivation are concentrated in the wards of Golborne, Notting Barns, Norland, and Redcliffe.

Objective	Key information / trends	
	deficiencies in RBKC:	
	• There is a concentration of socio-economic disadvantage in the North Kensington wards.	
	 Jobs located in Kensington and Chelsea on average are relatively low-paid; it seems that high-skilled, high-earning residents typically commute to work out of the Borough, while low skilled workers commute into the Borough. 	
	 While the Borough has a positive labour market balance – it provides more jobs than it has working residents. 	
	The Employment Land Study has estimated a minimum requirement of 114,000 sq m of office/B1 space between 2001 and 2021 and a maximum loss of 73,000 sq m of industrial/warehousing space over the same period.	
Equality	Despite perceptions to the contrary, the entire Borough is not affluent. Of local authorities in England, the Borough has moved down the IMD rankings since 2004 by 15 places from 116/354 to 101/354 (1 is most deprived and 354 least deprived).	
	Within the Royal Borough of Kensington and Chelsea, there is a clear north south delineation in regard to equity and social inclusion. Indices of Multiple Deprivation, clearly shows that the northern areas of the Borough are relatively more deprived than those in the south. Indeed, four wards (Golborne, St Charles, Notting Barns, Norland) in the north are in the 0-10% most deprived nationally, whereas the ward of Royal Hospital in the south includes an area are of the 81-100% least deprived, showing the Royal Borough to be an area of extremes.	
	The distribution of indices for Education, Skills and Training, Health Deprivation and Disability, Income and Average Income, also mirror this pattern.	
	Indices also vary for different criteria. For example, for education, skills and training deprivation (2007) 0 SOA's are within the 20% most deprived and 44 are within the 20% least deprived nationally – improving from 34 in 20% least deprived (2004). Whereas for barriers to housing and services (2007), 103 SOAs are within the 20% most deprived and 0 are within the 20% least deprived nationally – worsening from 23 in 20% most deprived (2004).	
	The percentage of pupils achieving 5 or more GCSEs A* - C increased by 5.6% between 2005 and 2008 to 58.1% - higher than the England average of 47.3%. The percentage of pupils achieving Level 4 or above in Key Stage 2 Maths increased by 17% between 1997 and 2006/07 and for English by 20%. Achievement in maths and English are higher for RBKC in 2007 than for London and the UK.	
Climate change	Of the data available, RBKC is currently performing well in regard to council owned buildings Standard Assessment Procedure (SAP) scores, and has been rising and achieving in accordance with specified targets. The average energy efficiency of housing stock continues to improve. Although data is limited, it is available for 2005 and 2006.	
	Gas consumption increased by 3.2% and electricity use decreased by 0.81% between 2005 and 2007 in RBKC. Overall, energy use per household decreased (5.7% gas consumption decrease and 1.9%	

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Objective	Key information / trends
	electricity consumption decrease) between 2005 and 2007. However, CO ₂ emissions increased by 3.1% between 2005 and 2006. There was no change in renewable energy consumption between 2005 and 2006. Total vehicle kilometres steadily decreased between 2002 (590 million) and 2005 (580 million). Between 2005 and 2006, RBKC saw a slight increase in CO ₂ emissions by end user from industry and commercial and domestic sources, but a slight decrease from transport.
Flooding	 The Royal Borough of Kensington and Chelsea lies to the north of the river Thames. The Thames barrier offers defence against flooding for all London boroughs with borders to the Thames. The south of the Borough is at risk from flooding by the Thames, with the wards of Cremorne and Royal Hospital containing areas of Flood Zone 2 and Flood Zone 3. The wards of Redcliffe, Earls Court and Stanley to the south west of the Borough also fall within this area of Flood Zone 2. The ward of Holland, in the west of the Borough, contains an area of Flood Zone 2. 92% of the Royal Borough has less than 0.1% probability of flooding in any year, 2% of the Borough has 0.1%-0.5% probability of flooding and only 6% has high probability of flooding-mainly areas adjacent to the Thames river. There are 4,823 properties (6% of all properties) at risk of tidal flooding. Approximately 92% of the properties at risk of flooding are residential. The main risk of flooding that the Borough faces is flooding from sewer and surface water. The modelling work undertaken as part of the Borough's Strategic Flood Risk Assessment (SFRA), shows that risk of surface water flooding is widespread at locations throughout the Borough. 373 properties flooded as a result of heavy rainfall causing surface water flooding on 20th July 2007.³
Air quality	 All of the Royal Borough of Kensington and Chelsea has been declared as an Air Quality Management Area (AQMA) for predicted exceedance of the objective values for PM₁₀ (Particulate Matter < 10 micrometres) and the annual mean NO₂ (Nitrogen Dioxide). There has been a steady decrease in annual background PM₁₀ concentrations between 2003 and 2007 (28 to 25) and roadside between 2001 and 2007 (from 45 to 35) to within the objective target of 10-40µg/m². Days when concentrations of PM₁₀ exceed 50 µg/m3 between 2005 and 2007 for the following wards: Earl's Court ~80, ~70, ~70; Cromwell Rd: ~40, ~60, ~35; North Kensington: ~50, <20, 19. Although overall there has been improvement between 2005 and 2007, the improvement is less clear between 2006 and 2007 and a high concentration was recorded for Crowell Road ward in 2006 making the overall trend unclear. The objective value for 2004 was 35 exceedances and, of these three wards, North Kensington was the only ward to clearly meet this target in 2007 (and 2006). All sites have been above the annual mean NO₂ concentrations for all years apart from North Kensington which fell below the objective level for the first time in 2006 and has remained just below in 2007. Also, for the first time in five years there has been an overall decline in annual mean

³ RBKC (2008) Strategic Flood Risk Assessment [online] available at: <u>http://www.rbkc.gov.uk/planning/localdevelopmentframework/ldf_strategic_flood_assess_map.pdf</u> (accessed 03/09)

Objective	Key information / trends	
	levels at roadside locations.	
	The objective for number of times in one hour the concentration of NO ₂ exceed 200 µg/m3 is 18, and this is reached by North Kensington and Cromwell Road, although it should be noted that North Kensington's average was higher for 2007 than 2006. Between 2005 and 2007, Knightsbridge peaked at 449 in 2007 and Chelsea Town Hall at 136 in 2006, showing an unclear trend for Chelsea Town Hall but an increasing and worsening trend for Knightsbridge. The introduction of stricter objectives for 2010 may mean that there will potentially be larger areas exceeding the objectives.	
Parks and open spaces	RBKC has the second lowest proportion of open space to total land areas in London (2.8%) and the lowest proportion of open space per 1,000 population in London (0.26ha). There are areas within the Borough where there is open space deprivation. To the south, the wards of Courtfield, Brompton, Redcliffe, Hans Town, Stanley, Royal Hospital and Cremorne are affected; the north west, Golborne, St Charles, Colville, Notting Barns and Norland wards are affected by open space deprivation. There are 188 hectares of open space in the Borough; 51 hectares of public open space, 47 hectares of public open space with limited access	
	and 90 hectares of private open space. In total this provides 2.8 square metres of public open space per resident. However, the Borough has limited amounts of public and private open space. According to the Park Strategy, the aim of the Council is to improve the quality of existing space rather than increase the amount of open space.	
Pollution	Noise complaints are rising with 6, 751 (2004/05), 9,504 (2005/06) and 9,706 (2006/07). Noise complaints were particularly elevated in 2000/01, 7,142. Complaints about other nuisance are reducing.	
	In 2005, water quality in this area of the Thames had been increasing for a period of eight years. There is a data gap for more recent information on river quality in this area of the Thames.	
	All land incidents recorded in Kensington and Chelsea have had no environmental impact (category 4) over the last five years, with the exception of two with minor environmental impact (category 3). There has been an improvement in the number of land pollution incidents, although there was an increase in 2007.	
Previously developed land	RBKC performs particularly well in regard to this objective, having 100% of development on previously developed land for the last four years, exceeding London (98%), the UK (70%) and the National Headline Target of 60%. This trend looks likely to continue. In 2005 land use in the Borough comprised:	
	Domestic buildings 19.2%	
	Non domestic buildings 11.2%	
	• Road 23.4%	
	Domestic gardens 17.5%	
	Green space 15.1%	
	• Water 2.5%	
	• Other 11.1%	

Objective	Key information / trends
Transport	The baseline information for air pollution indicates that road vehicles are a significant source of the air pollution within the Borough. The air quality modelling figures reinforce this message with areas of higher pollutant concentrations being the major road transport routes. Accessibility to public transport in the Borough is variable. Access rated very poor or worse is mainly located at the extremities of the ward; in the north west of the Borough (Golborne and St Charles wards) and the centre of the Borough (Holland), and to a lesser degree in the south (Redcliffe, Cremorne and Royal Hospital). Very good access runs through much of the centre of the Borough (with the exception of Holland ward).
Waste	 Overall the Borough has made good progress in its waste indicators. Between 2006/07 and 2007/08 household waste recycled increased by 3.45%. The percentage composted also improved from 0.69% to 0.90%. The figure for 2006/07 is better in the Borough (26.58% recycled or composted) compared to London (23% recycled or composted). In 2006 to 2007 the Council began to distribute free orange recycling sacks to all residents in a doorstep collection service which mean that the Council is just 2.7% behind the London wide target, which has increased to 27%. The Borough is also very densely populated with a very small number of private gardens that produce compostable waste. 1% target is the maximum attainable, unless the Council moves into the exceptionally difficult area of kitchen waste composting. The Borough has made progress in achieving over 8% year on year reduction on percentage of household waste land filled. There has been an increase in the number of mini recycling centres from 24 to 26 in 2007/08. Levels of household waste collected per head were lower in the Borough (349.3kg) than for London (428.7kg) and England (441.3kg) in 2007/08. However, this figure is still quite high with an increase in 2007/08 that is probably largely due to population estimate changes. The cost of waste collection dropped between 2006/07 and 2007/08 from £62.26 to £59.23 and targets were met. The target of 100% population served by kerbside collection or within 1km of recycling centre has been consistently reached in consecutive years because the collection of household green waste for composting counts as a recyclable collection for the purpose of this indicator.
Community facilities	 The information available indicates that accessibility in the Borough is on the increase, with 17.2% of local authority buildings suitable for and accessible by the disabled increasing to 28% in 2006/7. There is insufficient data to identify local trend in terms of access to services and facilities against London and national indicators. Three main public leisure centres serve the Borough and each of the main parks has a range of sports facilities on offer. There is no change in the number of public leisure centres and sport facilities. In terms of health, deprivation and disability; the wards in the north of the Borough (St Charles, Holborne, Notting Barns, much of Colville and Norland), rank within the 40% most deprived or worse. However, much of the other wards include areas of 81-100% least deprived, particularly Pembridge, Campden, Queen's Gate and Royal Hospital. Wards along the west boundary of the Borough are of mixed deprivation levels. For Education, Skills and Training, most of the Borough ranks reasonably

Objective	Key information / trends	
	well, but, again, with clearer levels of deprivation to the north. Norland, St Charles and Golborne in the north, and Cremorne in the south west, contain areas that are 21-40% most deprived.	
Housing	The Royal Borough has the highest property prices in the country. In 2008, the average residential property price in the Borough (£869,808) far exceeded the London (£345,911) and national average (£179,455). The average house price rose by almost £150,000 between April 2006 (£602,662) and April 2007 (765,926). This is a three times the previous year's increase of approximately £50,000. House price to income ratio is also higher and a significant increase occurred between 2003 and 2005 in the house price to income ratio.	
	In the UK in 2007 a little under 35% of the housing stock comprised unfit dwellings. In the Borough, just 4.1% of dwellings were unfit. However, in 2006 6.1% of private sector housing was unfit compared to 4.3% in the same study in 2000. The Borough has predicted is forecast to exceed its target by the end of 2016 to 2017, by achieving over 7000 net units.	
	Homelessness increased in the Borough from 1,146 in 2007/08 compared to 629 in 2003/04	
	The number of decent homes has gone down and non-decent local authority dwellings changed by 19.5% (2006/07 between 2007/08).	
	Dwelling density and numbers of derelict buildings are a likely data gap.	
	The Royal Borough of Kensington and Chelsea is the most densely populated area in the country. Additionally, there are 103 Super Output Areas (SOAs) are ranked in the most deprived 20% of authorities in England in relation to the indices of deprivation for barriers to housing and services housing. This has increased from 23 SOAs ranked in the most deprived 20% in 2004.	
Energy efficiency	In 2001 it was estimated that 31% of households in the Council's stock, and 13% of private sector households were fuel poor. There has been as significant decrease in fuel poor households in the Royal Borough. Energy efficiency improvements have been carried in Council owned buildings. In 2002 the Housing Revenue Account reported that 90% of Council stock had full or partial central heating.	
	The number of Decent Homes has decreased with a net reduction of over 200 properties. In regard to energy efficiency, there is a lack of data on any BREEAM or Ecohomes or equivalent assessments in the Borough, although the Council does perform well in regard to SAP ratings for Council owned buildings.	
Health	The Royal Borough of Kensington and Chelsea generally performs well in regard to health. However, in considering the distribution of equality of heath care it is interesting to note that in 2007 the northern area of the Borough has 3 SOAs ranked as the worst 20% performing SOAs in the England. The worst performing SOAs are found in St Charles, Golborne, and Notting Barns wards. This has improved from 2004 where there were 7 SOAs ranked as the worst performing 20%. The Royal Borough has higher life expectancies than the London and England and Wales averages.	

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Objective	Key information / trends	
Local distinctiveness	A large part of the Borough derives its character and townscape from heritage of eighteenth, nineteenth and early twentieth century buildin The Council has designated 36 Conservation Areas, encompassing about 72% of the Borough. The Borough also contains over 4,000 buildings which are listed at Grade II or above for their special architectural or historic interest.	
	There are further areas of architectural character and historic interest including strategically important views, for example that of St. Paul's Cathedral. The strategic importance of the Thames and the functions it serves in addition to its importance for archaeology are also recognised. The Borough's scheduled monuments, registered parks and gardens and archaeological priority areas are also important to local distinctiveness.	

2.3.4 **Table 5** aims to summarise key indicator trends from the recent baseline update in the SA Update Report.

Indicator	Improved (+) or worsened (-)	Summary of key trends
Objective 1: Biodiversity		
Bird Populations	-	Dunnock-marked decrease, Song Thrush decrease, House Sparrow locally extinct, Starling decrease [2006]
Objective 2: Crime		
Crime survey and recorded crime	+	23,485 notifiable offences in2007/08 compared to 30,714 in 2000/01
Violence against the person	+	Decrease in numbers of registered cases. 3,168 cases in 2007/08 compared to 3,378 cases in 2003/04
Burglary from Dwelling	+	1,086 cases in 2007/08 compared to 2,558 cases in 2000/01
Burglary (not from dwelling)	+	697 cases in 2007/08 compared to 991 cases in 2000/01
Sexual offences	+	154 cases in 2007/08 compared to 265 cases in 2003/04
Theft of a motor vehicle	+	566 cases in 2007/08 compared to 1,481 in 2000/01
Crime and disorder (calls to police regarding anti social behaviour)	+	8,251 cases in 2007/08 compared to 11,844 in 2000
Drug offences	-	2,721 cases in 2007/08 compared to 1,019 cases in 2003/04

Table 5: Key indicator trends from the 2009 baseline update

Indicator	Improved (+) or	Summary of key trends
	worsened (-)	
Objective 4: Equalities		
Percentage of pupils achieving Level 4 or above in Key Stage 2 English	+	87.2% in 2007/08 compared to 84% in 2003/04
Percentage of pupils achieving 5 or more GCSEs at Grades A*-C or equivalent	+	58.1% in 2008 compared to 56% in 2003/04
Percentage of pupils achieving Level 4 or above in Key Stage 2 Maths	+	83.4% in 2007/08 compared to 79% in 2003/04
Objective 7: Air quality		
Days when air pollution is Moderate or Higher (PM10)	+	In North Kensington, 19 days in 2007 compared to 59 days in 2003
Objective 11: Waste		
BV82a Household waste – percentage recycled	+	27.03% in 2007/08 compared to 16.13% in 2003/04
BV82a Household waste – percentage composted	+	0.9% in 2007/08 compared to 0.34% identified in the 2005 baseline
Objective 12: Community facili	ties	
Percentage of local authority buildings suitable for and accessible by disabled people	+	28% in 2006/07 compared to 14% in 2002/03
Objective 13: Housing		
Average house prices	-	The average house price rose by almost £150,000 between April 2006 (£602,662) and April 2007 (765,926). This is a three times the amount of the previous year's increase of approximately £50,000 over the year.
House price to income ratio	-	7.72 in 2005 compared to 4.47 in 2003
Housing conditions	+	Non-decent local authority dwellings was 24% in 2007/08 compared to 57% in 2003/04
Homelessness – households in temporary accommodation	-	1,146 in 2007/08 compared to 629 in 2003/04
Objective 14: Energy efficiency	·	
SAP ratings of council's housing stock	+	71 in 2007/08 compared to 61 in 2002/03

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Indicator	Improved (+) or worsened (-)	Summary of key trends
Objective 15: Health		
Health inequality	+	Male and female life expectancy at birth was 83.7 and 87.8 respectively in 2005/07 compared to 79 and 81.4 in 2000/02

The 'future baseline' without the plan - the 'business-as-usual' scenario

- 2.3.5 The Royal Borough of Kensington and Chelsea is likely to experience continued pressure on land availability to meet the high demand for housing and development. This is likely to place a greater burden on the already limited development land available and if not carefully managed could adversely impact on the local built and natural environment. Without the plan new development is unlikely to be constructed to such high sustainable design and construction standards and hence it may lack design improvements to enable greater flexibility in use, i.e. to meet occupants changing requirements over time, and to help mitigate developments' impacts on climate change.
- 2.3.6 In terms of the socio-economic conditions the Borough is likely to continue to see the highest house prices in the country with high income earning residents continuing to commute to higher paid jobs outside of the Borough. The economic and socio-economic disparity throughout the Borough, "the north-south divide" could worsen placing additional strain on the supply of housing and community infrastructure in the future. In terms of transport, accessibility to public transport should improve with the proposed London Underground / Overground stations in Kings Road and Lots Road/World's End, however, without a focus for redevelopment in the north of the Borough it is highly unlikely that a Crossrail station at Kensal could be justified. Furthermore, without specific attention to improving intra-borough connectivity, in particular addressing poor transport accessibility to and from the north of the Borough, existing socio-economic disparities between could be further exacerbated. Correspondingly, retail provision and large scale development is likely to be provided in areas with existing good public transport and road access and hence continue to focus around existing commercial centres.
- 2.3.7 Without the Core Strategy the clear need for regeneration in specific parts of the Borough may not be realised. For example, although the London Plan consultation draft replacement plan⁴ identifies the Kensal Canalside as an Opportunity Area and as an area with significant development potential it is noted that its regeneration is not without its challenges and constraints. The Core Strategy highlighting Kensal as an area of regeneration need and site allocation should help provide a greater impetus to its redevelopment, and in particular may catalyze opinion on the further benefits a Crossrail station would bring to the area. Similarly, education provision could also be impacted without a clear vision for new secondary schools in both the north and south to help address the current lack of places for the Borough's children. Furthermore, without clear visions such as to mitigate the negative influences of physical barriers such as the Westway, and improving and re-provision of housing and social and community infrastructure where most needed, opportunities to increase social inclusion, equality and equity among all Borough residents could be lost.

⁴ London Plan (2009) The London Plan Spatial Development Strategy for Greater London - Consultation draft replacement plan, available [online] at <u>http://www.london.gov.uk/shaping-london/london-plan/strategy/download.jsp</u>, accessed 26/10/09.

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2.4 A3 – Sustainability Issues

- 2.4.1 Task A3 involves drawing on the evidence gathered in Tasks A1 and A2 to identify those sustainability issues that are most pressing. The sustainability issues identified then form the basis for developing a robust SA framework (Task A4). Furthermore, the sustainability issues are a useful source of evidence to draw upon at the assessment stage.
- 2.4.2 The requirement to identify sustainability issues arises from the SEA Directive:

The 'Environmental Report' required under the SEA Directive should include:

"any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC [the 'Birds Directive'] and 92/43/EEC [the 'Habitats Directive']"

(Annex 1(d))

2.4.3 **Table 6** lists the economic, social and environmental issues facing the RBKC, as set out in the Scoping Report and SA Update Report.

Sustainability issue	Supporting evidence
Environment	
Air quality – the whole Borough is a declared AQMA for both PM ₁₀ and NO ₂	RBKC Inception Meeting (10/02/05) Days when concentrations of PM ₁₀ exceed 50 µg/m3 Annual mean NO ₂ concentrations No of times 1-hour concentration of NO ₂ exceed 200 µg/m3
Open Space – there is a shortage of open space in the Borough, and a shortage of areas in which to create additional open space	RBKC Inception Meeting (10/02/05) Open space per resident ha / resident – Second lowest proportion of open space to total land areas and lowest per population in London and the UK
Noise and Vibration – complaints have been rising since 2004	RBKC Inception Meeting (10/02/05) Public concern over noise
Traffic – two thirds more parking permits issued than parking spaces	RBKC Inception Meeting (10/02/05)
Waste – RBKC not meeting recycling targets	RBKC Inception Meeting (10/02/05) Household waste - percentage recycled, Household waste - percentage composted, just below London averages Adequate waste and recycling storage in new builds / housing conversions / office space (also to include community composting)
Area of sites of nature conservation value	Bird Populations in decline Loss of sites of conservation value

Table 6: Sustainability issues facing RBKC

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Sustainability issue	Supporting evidence
Social	
Housing – the availability of low cost, affordable housing	RBKC Inception Meeting (10/02/05) Average house prices – highest in the UK at over £850,000 in 2008 Homelessness – upward trend in the numbers of homeless since 2000/2001
Health - Shortage of Doctors Surgeries and GPs	RBKC Inception Meeting (10/02/05)
Education – Monitoring of education performance in the Borough proposed Need for secondary school in the SW of the Borough	RBKC Inception Meeting (10/02/05) No. of pupils per 1,000 permanently excluded from primary schools – increased by nearly 200% from 2001/2002 levels in 2003/2004
Community Facilities – lack of elderly person homes (Care Homes)	RBKC Inception Meeting (10/02/05)
Crime	RBKC Inception Meeting (10/02/05) Total notifiable offences are declining; however, there have been increases in drug offences
Economic	
Deprivation – some wards amongst the most economically deprived in the country in particular, North Kensington (north of the Westway) and SW Chelsea	RBKC Inception Meeting (10/02/05) Income and Employment indices of deprivation - Clear inequalities between the North and the South of the Borough with many SOAs being in the bottom 20% of those in the England. Index of multiple deprivation shows a clear delineation between north and south.
Shortage of small office units, <300m ² and particularly <100m ²	RBKC Inception Meeting (10/02/05) The Employment Land Study has estimated a minimum requirement of 114,000 sq m of office/B1 space between 2001 and 2021 and a maximum loss of 73,000m ² of industrial/warehousing space over the same period.
Average house prices	Average house prices the highest in the UK at over \pounds 850,000 in 2008, creating a barrier to entry for low and medium level earners ⁵ .

2.5 A4 – Developing the SA Framework

2.5.1 SA is fundamentally based on an objectives-led approach whereby the potential impacts of a plan are gauged in relation to a series of aspirational objectives for sustainable development. In other

⁵ Although housing prices have fallen in the last year, the Borough is likely to continue to experience above average housing prices and corresponding affordability issues.

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words, the objectives provide a methodological yardstick against which to assess the effects of the plan.

2.5.2 The SA objectives were developed primarily by drawing on the sustainability issues identified at Task A3, but also taking account of other evidence gathered at Tasks A1 and A2. **Table 7** sets out the SA Objectives identified for the Royal Borough of Kensington and Chelsea. This table includes changes made to the SA Framework from the SA Update Report as shown in *italics*.

Table 7: The RBKC LDF SA Objectives

- 1. To conserve and enhance the natural environment and biodiversity
- 2. To reduce crime and anti-social behaviour and the fear of crime
- 3. To support a diverse and vibrant local economy to foster sustainable economic growth
- 4. To encourage social inclusion *(including access)*, equity, the promotion of equality and a respect for diversity
- 5. To minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables *and adopt measures to adapt to climate change*
- 6. To reduce the risk of flooding to current and future residents
- 7. To improve air quality in the Royal Borough
- 8. To protect and enhance the Royal Borough's parks and open spaces
- 9. To reduce pollution of air, water and land
- 9a. To prioritise development on previously developed land
- 10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic
- 11. To reduce the amount of waste produced and maximise the amount of waste that is recycled
- 12. To ensure that social and community uses and facilities which serve a local need are enhanced, protected, and to encourage the provision of new community facilities
- 13. To aim that the housing needs of the Royal Borough's residents are met
- 14. To encourage energy efficiency through building design; maximise the re-use of building's and the recycling of building materials
- 15. To ensure the provision of accessible health care for all Borough residents
- 16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage

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3 The Core Strategy

- 3.1.1 The statutory spatial development plan for the Royal Borough of Kensington and Chelsea is called the Local Development Framework (LDF) and is made up of a portfolio of documents, including the **Proposed Submission Core Strategy for the Royal Borough of Kensington and Chelsea with a focus on North Kensington** Development Plan Document (DPD) (the 'Core Strategy'). The Core Strategy is the principal document in the LDF and, once adopted, will set out the Borough's future development over the next 20 years. In particular, it will be used to identify and propose development of strategic importance to the Borough. Importantly, the other documents contained in the LDF must be in general conformity with the Core Strategy.
- 3.1.2 The Borough has reached the pre-submission stage in the development of the Core Strategy. The Core Strategy is based around three main components: The Spatial Strategy, the Delivery Strategy and Supporting Information:
 - The **Spatial Strategy** is divided into two parts and sets out what the Borough wants to achieve:
 - **Strategic Objectives** these inform the direction of the Core Strategy and outline how to achieve the Core Strategy's vision
 - **Places** identifies 14 key areas across the Borough which are seen to require particular focus, some of which are planned for considerable change
 - The **Delivery Strategy** sets out how the Spatial Strategy is to be achieved and is divided into four main parts:
 - Strategic Sites these are allocated areas within the Borough which are needed to deliver the Spatial Strategy
 - Policies and Actions the Development Management policies add further depth to the delivery of the Strategic Objectives
 - Infrastructure Requirements set out for the 14 Places and 7 Strategic Sites
 - Monitoring Framework sets out how delivery of the plan will be ensured, particularly if key policies fail.
- 3.1.3 The **Supporting information** contains the Housing Trajectory as well as other supporting information.

3.2 The Core Strategy Objectives

3.2.1 The Core Strategy identifies seven Strategic Objectives. The Strategic Objectives structure the plan and have been used to inform its direction. They set out how the 'Vision' of the Core Strategy will be delivered and hence can be considered as the 'Core Strategy'. The Strategic Objectives are listed in **Table 8**.

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Table 8: Core Strategy Strategic Objectives

Strategic Objective	Topics addressed by Strategic Objective
Keeping Life Local	Social and Community Uses, Local Shopping Facilities and "Walkable Neighbourhoods"
Fostering Vitality	Town centres, Retail, Arts and Culture and Business
Better Travel Choices	Public transport, Walking and Cycling, Parking
An Engaging Public Realm	A Sense of Place, Attractive streets, Parks and Outdoor Spaces
Renewing the Legacy	Conservation, Enhancement and Design Quality
Diversity of Housing	Affordable and Market Housing, Housing Mix Estate Renewal
Respecting Environmental Limits	Climate Change, Flooding, Waste, Biodiversity, Air Quality, Noise and Vibration

3.3 Places

3.3.1 Fourteen places have been identified by the Council, even though the Borough comprises more places. The Places selected for the Core Strategy are those where significant change is planned, and include the district, major and international town centres that are the focus of the activity, with the exception of Westway. Westway has been included because of its particular negative impacts that need to be addressed as part of planned regeneration in North Kensington. They include places proposed for regeneration in North Kensington, places that experience particularly high numbers of visitors with a particular national or international reputation and other places in the Borough. The Places are listed in **Table 9**.

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Table 9: Core Strategy Places

Places of particular national international reputation	or
Earl's Court	
Kensington High Street	
South Kensington	
Brompton Cross	
Knightsbridge	
King's Road / Sloane Square	

Places central to regeneration in North Kensington
Kensal
Golborne / Trellick
Portobello / Notting Hill
Westway
Latimer
Other places
Notting Hill Gate
Fulham Road
Lots Road / World's End

3.3.2 Each Place provides an introduction that sets out its basic issues, a vision to guide its future evolution, priorities for action for the Council and partners (set out under the Strategic Objectives for the Core Strategy) and delivery including a policy to guide development management decisions. The Places policies (including Spatial Strategy policies) are listed in **Table 10**.

Table 10: Spatial Strategy and Places Policies

Spatial Strategy and Places Policies
CP 1: Core Policy: Quanta of Development
CP 2: Places
CP 3: North Kensington
CP 4: Kensal
CP 5: Golborne / Trellick
CP 6: Portobello / Notting Hill
CP 7: Westway
CP 8: Latimer
CP 9: Earl's Court
CP 10: Kensington High Street
CP 11: South Kensington
CP 12: Brompton Cross
CP 13: Knightsbridge
CP 14: King's Road / Sloane Square
CP 15: Notting Hill Gate
CP 16: Fulham Road

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Spatial Strategy and Places Policies

CP 17: Lots Road / World's End

3.4 Strategic Sites

3.4.1 The Strategic Sites are sites where great change is envisaged in the Borough. Their development or redevelopment is considered central to achieve the Strategic Objectives and the overall Core Strategy Vision. Eight Strategic Sites have been identified across the Borough, with seven of these allocated in the Core Strategy. The Strategic Sites and their associated policies are listed in **Table 11**. The Lots Road Power Station site has already been granted planning permission. Although it is not an allocation, it has been included in the Core Strategy for information as the Council recognises that this is an important site which will play a significant role in meeting the Borough's housing target.

Table 11: Core Strategy Strategic Sites

Strategic Sites
CA 1: Kensal Gasworks
CA 2: Wornington Green
CA 3: Land Adjacent to Trellick Tower
CA 4: North Kensington Sports Centre
CA 5: Allocation for The former Commonwealth Institute
CA 6: Warwick Road
CA 7: Earl's Court
Lots Road Power Station (not allocated, but included for information only

Reasons for selecting the preferred strategic sites allocated in the Core Strategy

- 3.4.2 Work on the Core Strategy began in 2004 and a formal Issues and Options stage was held in November 2005. Following this, a second stage of Interim Issues and Options for the Core Strategy took place in February March 2008. The 'Towards Preferred Options' document was the third stage in the preparation of the Core Strategy where a consultation opportunity was held between July and October 2008. The 'Towards Preferred Options' was where the North Kensington Area Action Plan (NKAAP), which was a separate DPD, was incorporated into the Core Strategy. The DPD was referred to as the 'Core Strategy and North Kensington Plan'. Prior to this inclusion, the NKAAP was subject to a formal Issues and Options stage in February 2008. In October 2009 the Council finalised the Core Strategy called the **Proposed Submission Core Strategy for the Royal Borough of Kensington and Chelsea with a focus on North Kensington**.
- 3.4.3 **Figure 3** illustrates the development of the Core Strategy.

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Figure 3: History of the development of the Core Strategy



3.4.4 **Figure 4** illustrates when and where strategic site options were considered in the development of the plan.

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Wornington North Kensington Commonwealth Warwick Kensal Trellick Tower Earl's Court Green Sports Centre Institute Road North Kensington Area Action Plan February 2008 Option 4: piecemeal development of just the Ballymore and Sainsbury's sites, (in effect the medium growth option of the NKAAP) Option 5: status quo leaving as an employment zone and seeing what happens. (ie low growth option in NKAAP) Towards Preferred Options Three options considered: Two options considered: July 2008 · Office led mixed use · To rebuild the sports development; Option 1: A residentialcentre · Residential led mixed use dominant scheme with · Move the sports centre development; and possibly up to 5184 to another location · Development including a dwellings and 20,000som of convention or exhibition commercial floorspace (the centre maximum proposed with a Crossrail station): Development of the site Option 2: Significant mixed includes a larger part of the use redevelopment with a site in Hammersmith & Crossrail station Fulham. RBKC will not Option 3: A single use develop the site alone. "megastructure campus" (this would most likely be linked to health or education) scheme with 404 dwellings and 500,000sqm of commercial floorspace without Crossrail and 920 dwellings and 580,000sqm with a station. Options for four sites Site Owner researched Stock Options review: Options considered Options considered in draft Other Option 1: to redevelop the considered in adopted SPD following the Towards SPDoptions: full estate (except for 3 options for use of the tent and guidelines to be issued Option o: Decent Homes Preferred Options: Standard Trellick tower) including Option 1: status quo Option 12 exhibition use for West Cromwell Road. some realignment of the **Option 1: Full Refurbishment** Option 2: Incorporating it as Option 2: assembly and and Remodelling road system to make for part of a wider masterplan -Existing range of uses were leisure uses allowed to change to Option 2: Refurbishment, better connections and i.e. using it as part of a Option 3: theatre use residential and two planning remodelling and focused bus-services. Some decant strategy. This was redevelopment 'sub-options' include the full implicit in the Towards 4 options for use of the rest permissions have been Option 3: Minimum reinstatement of the historic Preferred options document of the site granted on this basis. street pattern, others do Option 1: residential refurbishment, with where it was referenced as not, but all involve the part of the wider masterplan Option 21 offices extensive redevelopment Option 4: Full Redevelopreplacement of the existing for the area. Option 32 hotel housing estate. ment. Option 3: Discrete site Option 4: retail
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						continued
Kensal	Wornington Green	Trellick Tower	North Kensington Sports Centre	Commonwealth Institute	Warwick Road	Earl's Court
		Option 21 restricting redervelopment to the vacant site to the south west of Trellick Tower, and using this for housing purposes as part of the need to raise revenue to restore Trellick Tower. The new housing built may be used either for private sale, or to relocate residents in the tower, which would then, following refurbishment, be released for private sale. Option 31 as option 2, but developing housing that focuses on the needs of older people, reflecting the fact that the last use of the site was an old people's home.	redevelopment for a sports centre and some housing. Option 4: Discrete site redevelopment for a school, and possibly new sport centre and housing – this responds to the feedback from the consultations, and our overriding need to identify a school site. It doesn't leopardise wider planning objectives (just removes a possible decant site).			
North Kensington Area Action Plan February 2008 Preferred option: Option 2: Significant mixed use redevelopment with a Crossrall station	Preferred option: Option 4: Full redevelop- ment	Preferred option: Option 2: restricting redevelopment to the vacant site to the south west of Trellick Tower, and using this for housing purposes as part of the need to raise revenue to restore Trellick Tower. The new housing built may be used either for private sale, or to relocate residents in the tower, which would then, following refurbishment, be released for private sale. This option also includes restoration of the Grade II* Ested Trellick Tower.	Preferred option: Option 4: site redevelop- ment for a school, and possibly new sport centre and housing – this responds to the feedback from the consultations and our overriding need to identify a school site. It doesn't leopardise wider planning objectives (just removes a possible decant site)	Preferred option: Use of the tent - Option 1: Exhibition use Use of rest of the site - no preferred option: Option 1: residential Option 2: offices Option 3: hotel Option 4: retail	Preferred option: Residential led mixed use development	Preferred option: Mixed use with a Convention Centre or Exhibition use

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3.4.5 The information contained in the next section is taken from the Core Strategy document and background information on options development for the strategic sites prepared by the Council.

Kensal Gasworks (sites north and south of the railway)

- 3.4.6 Kensal represents a significant opportunity to act as a catalyst not only for the regeneration of the north of the Borough but for north/west-central London as a whole.
- 3.4.7 A new Crossrail station would provide a high speed link to the West End, The City and Canary Wharf and dramatically enhance accessibility and create the opportunity to develop homes and jobs. This would be a significant development that could act as a catalyst for further major redevelopment in North Kensington.
- 3.4.8 According to the Council, the preferred option of development of a mixed use scheme is more likely to stimulate regeneration by integrating with the rest of North Kensington as it is likely to provide functions which are valued by those in the wider area. The provision of a Crossrail station will also mean that the station should be used to its full potential which means providing uses which would ensure that station is well used outside peak times. The residential development on these sites will also positively contribute to the Council's housing requirements.

Wornington Green

- 3.4.9 The site is of strategic importance to the Borough because of its size and the disruption that will be caused to local residents of the Estate and to the surrounding area. In addition, it will reconnect Portobello Road to Ladbroke Grove at the Barlby Road junction, which will make a significant improvement to pedestrian movement along Portobello Road, stimulating the northern end of Portobello Road and its market and also helping Golborne Road and its market.
- 3.4.10 It is also the first Estate Renewal scheme in the Borough, and because of its potential to achieve significant shift in the 'Diversity of Housing' is of strategic importance.
- 3.4.11 The current housing on the site fails to meet the Decent Homes Standards. Kensington Housing Trust, who own the site have expressed a strong preference to redevelop the estate, using receipts from private housing to fund the reprovision of the existing social rented housing. As Wornington Green Estate is predominantly social housing it is of strategic importance that any redevelopment of the estate delivers the strategic objective 'Diversity of Housing' which is one of the seven strategic themes of the Core Strategy. Reprovision of the existing social housing but also providing for private market housing will create a greater diversity of housing and therefore is of strategic importance to the Borough.
- 3.4.12 According to the Council, the preferred option of a total redevelopment would restore also the original streetscape back into the wider community, it would solve some of the crime and disorderly issues currently faced on the estate, it would provide a balanced and mixed tenure community and the wider community will benefit from a new better quality park and community facility.

Land adjacent to Trellick Tower

3.4.13 Trellick Tower is a Grade II* listed building and is an iconic historic building within the Borough, which is in need of costly restoration. Its maintenance and enhancement is crucial to the 'Renewing the Legacy' Strategic Objective of the Core Strategy and therefore, the development of the surrounding land is considered vital in funding the restoration. Failure to allocate the site will result in a delay in the implementation of the restoration of Trellick Tower.

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3.4.14 According to the Council, the preferred option of restricting redevelopment to the vacant site to the south west of Trellick Tower, and using this for housing purposes as part of the need to raise revenue to restore Trellick Tower. The new housing built may be used either for private sale, or to relocate residents in the tower, which would then, following refurbishment, be released for private sale. This option presents the ability to restore the Grade II* listed Trellick Tower.

North Kensington Sports Centre

- 3.4.15 It is a Strategic Site because it has been identified to accommodate the new secondary school required in the north of the Borough. The site is also currently an important sports and leisure facility in this part of the Borough.
- 3.4.16 According to the Council, the preferred option of discrete site redevelopment for a school, and possibly new sports centre and housing responds to the feedback from previous consultations and the Borough's overriding need to identify a school site.

The former Commonwealth Institute

- 3.4.17 This site has been allocated as a Strategic Site despite its relatively small size given the potential that it has to assist in achieving the vision for the Kensington High Street place. The re-use of the site as a major trip-generating exhibition space could help anchor the western end of Kensington High Street and give it a new focus at a time where the centre is likely to be under considerable pressure from both the current market down turn and from the Westfield London shopping centre. In addition, a use needs to be found to secure the long-term future of this unique Grade II* listed building.
- 3.4.18 According to the Council, the preferable option for the use of the tent is as an exhibition centre as this is the use that the building was designed for, and as the draft SPD points out, *"the best use for a listed building is that for which it was originally designed"*. However, assembly and leisure and theatre use may be appropriate.
- 3.4.19 In regard to the rest of the site, the Council suggests that suggests that residential, offices, hotel or retail uses may be appropriate as long as they will enable the protection of the integrity of the "tent". The Council does not therefore have a preferred option, although notes that a mixed use including aspects of all/some could be appropriate given the sites location immediately abutting the Kensington High Street Major Shopping Centre.

Warwick Road (5 sites including 100 West Cromwell Road)

- 3.4.20 The sites will meet a significant proportion of the housing target in the Borough by creating a high-quality residential environment with an opportunity for a coordinated sustainable development and related infrastructure, including the provision of associated community facilities. The design of the development will incorporate high standard architecture and will need to consider community safety.
- 3.4.21 The existing range of different uses for the sites (offices, Territorial Army centre, etc) and existing office use permission (unimplemented at 100 West Cromwell Road) were allowed to change to residential use to meet the Borough's required housing need. As these two planning permissions have been granted to the northern sites on this basis, it is now not possible to return to this decision. No other land use options were therefore considered.

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Earl's Court

- 3.4.22 The site is of strategic importance because of its size and its current pan-London function as an exhibition centre. The aim of this site is to provide a mixed-use development which will include residential, employment, and other uses. The Earl's Court Site falls within the Earl's Court, West Kensington and North Fulham Regeneration Area which includes sites in the London Borough of Hammersmith and Fulham. A scheme for the whole Regeneration Area would need to be agreed with both boroughs.
- 3.4.23 A comprehensive scheme for the wider site could provide a strong mix of development, a vibrant new community, new housing, and the economies of scale needed to support and attract facilities such as a potential Convention Centre and leisure or cultural uses. Further details will be specified in a forthcoming Area Action Plan prepared jointly with the London Borough of Hammersmith and Fulham. The area will be designated as an Opportunity area in the new London Plan.
- 3.4.24 The Council did not consider preparing plans for the Borough's part of the site alone, as the larger part of the site is in the London Borough of Hammersmith & Fulham. They also rejected the following options of:
 - significant retail because of a) Westfield an b) a desire for regeneration to reinforce Earl's Court Road and North End Road in Hammersmith & Fulham; and
 - 'status quo' is not an option and the site owners (Capital and Counties) have announced that once the volley ball is complete as part of the Olympics, the Earl's Court Exhibition Centre will cease to be and the Council understands that they have stopped taking bookings after this date.

3.5 Development Management Policies

3.5.1 The seven Strategic Objectives outlined below are supported by Development Management Policies which will help to achieve the Council's overarching Vision and guide development across the Borough. These are included in **Table 12**.

Strategic Objective	Development Management Policies
N/A	C 1: Infrastructure Delivery and Planning Obligations
Keeping Life Local	CK 1:Social and Community Uses
	CK 2: Local Shopping Facilities
	CK 3: Walkable Neighbourhoods and Neighbourhood Facilities
Fostering Vitality	CF 1: Location of New Shop Uses
	CF 2: Retail Development within Town Centres
	CF 3: Diversity of uses within Town Centres
	CF 4: Street Markets

Table 12: Core Strategy Strategic Objectives and Development Management Policies

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Strategic Objective	Development Management Policies
	CF 5: Location of Business Uses
	CF 6: Creative and Cultural Businesses
	CF 7: Arts and Culture Uses
	CF 8: Hotels
	CF 9: The South Kensington Strategic Cultural Area
Better Travel Choices	CT 1: Improving Alternatives to Car Use
	CT 2: New and Enhanced Rail Infrastructure
An Engaging Public Realm	CR 1: Street Network
	CR 2: Three-Dimensional Street Form
	CR 3: Street and Outdoor Life
	CR 4: Streetscape
	CR 5: Parks. Gardens, Open Spaces and Waterways
	CR 6: Trees and Landscape
	CR 7: Servicing
Renewing the Legacy	CL 1: Context and Character
	CL 2: New Buildings, Extensions and Modifications to Existing Buildings
	CL 3: Historic Environment
	CL 4: Historic Assets
	CL 5: Amenity
	CL 6: Smallscale Alterations and Additions
Diversity of Housing	CH 1:Housing Targets
	CH 2: Housing Diversity
	CH 3: Protection of Residential Uses
	CH 4: Estate Renewal
Respecting Environmental Limits	CE 1: Climate Change
	CE 2: Flooding
	CE 3: Waste
	CE 4: Biodiversity
	CE 5: Air Quality
	CE 6: Noise and Vibration

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4 Appraisal Methodology

4.1.1 This Chapter sets out the methodology for appraisal, as required by the SEA Directive:

The Environment report required under the SEA Directive should include:

A description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information'

Annex 1 (h)

- 4.1.2 The appraisal was carried out using the revised SA framework as defined in the *Sustainability Appraisal Update Report*⁶ and included in **Table 7**. The revised SA Framework consists of 16 objectives against which the Core Strategy has been appraised.
- 4.1.3 The appraisal was a qualitative exercise based on the professional judgement of Scott Wilson. However, where possible, judgements were made taking into account evidence gathered at the Scoping Stage, further evidence that came to light in the *Sustainability Appraisal Update Report* (as outlined in **Chapter 2**) as well as other recent evidence.
- 4.1.4 The compatibility or performance of the Strategic Objectives, Places, Strategic Sites and Development Management Policies against each SA objective was given a score according to the criteria set out in **Table 13**.

Scoring Symbol	Meaning
++	Significant positive benefit
+	Some positive benefit
0	No significant effect
Х	Some adverse effect
XX	Significant adverse effect
?	Uncertain or insufficient information on which to determine

Table 13: Scoring criteria

- 4.1.5 When determining the likely significance of effects, consideration was given to the characteristics of the effects and the sensitivity of the receptors involved. For example, the following can all determine whether effects may be significant:
 - Probability, duration, frequency and reversibility of effects;
 - Cumulative nature of effects;
 - Magnitude and spatial extent of the effects; and
 - Value and vulnerability of area likely to be effected.
- 4.1.6 This Sustainability Appraisal has been undertaken on the following main elements of the Spatial Strategy and Delivery Strategy: Strategic Objectives, Places, Strategic Sites and Development Management Policies as shown in **Figure 5**.

⁶ Sustainability Appraisal Update Report (July 2009) Royal Borough of Kensington and Chelsea

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Figure 5: Four main elements of the Core Strategy appraisal

- 4.1.7 The Strategic Objectives appraisal involved assessing their compatibility with the SA objectives. Due to the strategic nature of the objectives and the limited information provided it was difficult to undertake an appraisal of the compatibility between the Strategic Objectives and the SA objectives. Therefore, in order to meaningfully appraise their compatibility, supporting information provided for each Strategic Objective as contained in the Development Management Policies section was used to inform the appraisal.
- 4.1.8 The appraisal of the Places (including Spatial Strategy) policies involved identifying likely impacts of the particular policies on the SA objectives. In order to more clearly determine impacts for these policies the appraisal has also relied heavily on information contained under the Priorities for Action section and supporting text for the respective policies. This appraisal assumed that the Development Management Polices would be fully implemented.
- 4.1.9 The Strategic Sites appraisal involved individually assessing the sites using a two stage approach. First, each of the sites was input into a Geographical Information System (GIS). The GIS allowed the integration of different spatial information e.g. the location of listed buildings, Sites of Conservation Importance to be viewed on one map. Twenty four (24) constraint layers were input into the GIS which provided information on the key constraints facing development / redevelopment of the Strategic Sites in the Borough. A full list of the constraint layers is provided in Appendix 2. The list of constraints were split into two tiers, this represents the division between statutory designations (1st tier) and non-statutory designations (2nd tier). The constraints affecting each site were then identified and described.
- 4.1.10 The second part of the assessment process involved appraising the expected impacts of each site in terms of its proposed use, the content of the site policy and information contained under the Allocation section against the SA objectives. This also took into consideration on-site and surrounding site constraints.
- 4.1.11 The appraisal of the Development Management Policies has focussed on identifying impacts of polices against the SA objectives. Uncertain impacts including whether the outcome of the policies would result in a positive or negative impact on the SA objectives have been identified.

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These uncertainties are, in part, a result of the strategic nature of the Core Strategy and the uncertainty surrounding precisely how the policies would be implemented on the ground, as well as, the degree to which they would be achieved in practice. With this in mind, this appraisal was undertaken assuming the Development Management policies would be implemented in full as prescribed.

4.2 Difficulties encountered

- 4.2.1 A key issue in undertaking the appraisal of the Core Strategy was the strategic nature of the document, the uncertainty surrounding precisely how its ambitions would be implemented on the ground and the degree to which they would be achieved in practice (particularly since many different partners are involved in its delivery). A key assumption was made that the policies in the Core Strategy would be fully implemented (i.e. they were taken at 'face value'); however, having said this, where tensions between priorities were evident or it appeared clear that full implementation may be problematic or involve trade-offs, we have done our best to highlight these.
- 4.2.2 As mentioned in the previous section, in all cases the appraisal of the four elements of the Core Strategy has relied upon supporting policy text in order to identify potential impacts and undertake a more meaningful appraisal.

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5 Appraisal Findings

5.1 Introduction

- 5.1.1 This chapter sets out the findings from the appraisal of the Core Strategy. In particular the appraisal of the Strategic Objectives, Places, Strategic Sites and Development Management Policies.
- 5.1.2 The identification of significant effects is a requirement of the SEA Directive:

The SEA Directive requires 'the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors; to be included in the environmental report.

Annex 1f, the SEA Directive

5.1.3 This chapter also sets out the mitigation measures identified during the appraisal. The mitigation of significant effects is a key requirement of the SEA Directive:

The SEA Directive requires 'the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme' to be included in the environmental report.

Annex 1g, the SEA Directive

5.1.4 Mitigation measures are identified in detail in this chapter and then summarised further, and presented alongside proposals for monitoring, in **Chapter 7**. Many of the measures proposed are in the form of general recommendations or points for consideration, rather than measures designed to counter specific impacts.

5.2 Core Strategy Strategic Objectives

- 5.2.1 This chapter provides the appraisal of the Core Strategy Strategic Objectives. It is important that the Strategic Objectives are compatible with the Sustainability Appraisal Objectives.
- 5.2.2 **Table 14** presents the results of the appraisal.

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	SA	Objectives				Core Strategy Obje	ctives		
			Keeping Life Local	Fostering Vitality	Better Travel Choices	An Engaging Public Realm	Renewing the Legacy	Diversity of Housing	Respecting Environmental Limits
	1.	Biodiversity	0	?	0	+	+	?	+
	5.	Climate change	+	?	+	+	?	?	++
	6.	Flood risk	0	0	0	0	0	0	++
	7.	Air quality	+	?	+	+	0	?	+
Environment	8.	Parks & open spaces	?	?	0	+	+	?	0
ron	9.	Pollution	+	?	+	+	?	?	?
Envi	9a.	Previously developed land	?	?	0	?	?	?	?
	10.	Transport	++	+	++	+	0	?	0
	11.	Waste	0	0	0	0	0	0	++
	14.	Energy efficiency	?	?	0	0	0	+	+
	16.	Cultural heritage	?	+	0	+	++	?	?
	2.	Crime	0	0	?	+	0	0	0
a	4.	Equalities	+	+	+	+	+	+	0
Social	12.	Community facilities	+	+	0	+	0	0	0
	13.	Housing	0	?	?	0	?	++	0
	15.	Health	++	0	0	0	0	0	0
Economy	3.	Economic growth	++	++	?	+	0	0	0

Table 14: Strategic Objectives Appraisal

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Keeping Life Local

Environment

- 5.2.3 The Strategic Objective's focus on local amenity value, particularly through social and community infrastructure is likely to provide secondary environmental benefits. The provision of community facilities *"to be easily accessible"* is likely to be compatible with the climate change, air quality, pollution and transport SA objectives.
- 5.2.4 The extent to which the Strategic Objective is compatible with the biodiversity, parks and open spaces and previously developed land SA objectives is not clear and would be dependent upon the detail of local and borough wide development proposals. Similarly, depending on the detailed design and construction plans of development proposals the compatibility of this Strategic Objective with the energy efficiency and cultural heritage SA objectives is also uncertain.

Social

5.2.5 The Strategic Objective's focus on ensuring social and community facilities are widely available and local functions easily accessible are compatible with the equalities, community facilities and health SA objectives.

Economy

5.2.6 A focus on local shopping facilities to be easily accessible should ensure compatibility with supporting a diverse and vibrant local economy to foster sustainable economic growth.

Fostering Vitality

Environment

- 5.2.7 This Strategic Objective aims to provide a *"wide variety of cultural, creative and commercial uses"* and hence, given the strategic level of the objective it is difficult to accurately determine its compatibility with the environmentally focussed SA objectives. The focus on retail expansion and encouraging businesses could place pressure on local environmental resources and contribute to increased emissions in the Borough, however, the supporting information identifying retaining and promoting large employers in higher order centres with good public transport infrastructure may in part mitigate any adverse impacts and this is reflected in its compatibility with the transport SA objective.
- 5.2.8 The extent to which energy efficiency through building design and the reuse of building and the recycling of building materials (energy efficiency) is encouraged is unclear.

Social

- 5.2.9 The Strategic Objective's focus on cultural, creative and commercial uses should result in compatibility with the equalities and community facilities SA objectives, assuming that these facilities are accessible to all.
- 5.2.10 The extent to which the housing SA objective can be met is unclear as a focus on retail expansion and provision of commercial space could place increasing pressure on competition for land and raise residential land prices in the Borough.

Economy

5.2.11 As expected, the Strategic Objective is compatible with the economic growth supporting a diverse and vibrant local economy given the focus on provision of a variety of retail and commercial space across the Borough.

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Better Travel Choices

Environment

5.2.12 An increase in cycling, walking and better provision and use of public transport should help promote traffic reduction and encourage more sustainable forms of transport use. Hence this Strategic Objective should lead to an improvement in local air quality and reduced air pollution. Furthermore, it is likely to be compatible with minimising the effects on climate change through reduced emissions.

Social

- 5.2.13 The supporting information highlighting the need to improve street permeability through the removal of barriers, for example, should improve access throughout the Borough and particularly in the north. This is compatible with the equalities SA objective.
- 5.2.14 It is possible that greater footfall generated by increased walking and cycling could lead to a reduction in crime, however, this would be dependent upon the particular measures to reduce crime to be incorporated within the detailed design.
- 5.2.15 The extent to which the housing needs of the Borough can be met is likely to be dependent on the delivery of the proposed new stations in the Borough (at Imperial Wharf and Kensal) as delivery of such transport infrastructure should be brought forward in parallel with high density housing in these locations.

Economy

5.2.16 It is unclear as to the extent to which this Strategic Objective is compatible with the economic growth SA objective. Improved public transport and the removal of barriers for pedestrians to make the Borough a more attractive retail destination could help this sector; however, for businesses more dependent upon road infrastructure for their operations, this Strategic Objective may affect the operation of these businesses.

An Engaging Public Realm

Environment

- 5.2.17 Building a street network and streetscape based on the Borough's historic patterns with a focus on high quality network of streets, squares and public spaces is likely to be compatible with the biodiversity, climate change, parks and open spaces, transport and cultural heritage SA objectives. *"Enhancing the public realm"* should also contribute to improving air quality in the Borough and reducing air pollution.
- 5.2.18 The extent to which regeneration is focussed on previously developed land is not clear, however, it would be expected that where possible, previously developed land not designated for future building be returned to public amenity use with a focus on green infrastructure.

Social

5.2.19 An improved public realm is likely to be compatible with the crime, equalities and community facilities SA objectives.

Economy

5.2.20 It is unclear the extent to which this Strategic Objective is compatible with the economically focussed SA objective, however measures to improve the Borough's public realm should make it a more attractive place to live, work and visit.

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Renewing the Legacy

Environment

- 5.2.21 This Strategic Objective clearly identifies the importance *"to ensure no diminution"* of the Borough's quality built and natural environment as a key element to the long-term success of the Borough. This should ensure compatibility with the environmentally focussed SA objectives. The supporting information highlights the inevitable need to update, renew or replace the building stock which should result in improved energy efficiency whilst maintaining the Borough's cultural heritage. The aspiration to create new conservation areas could potentially help in ensuring the conservation of biodiversity and the enhancement the Borough's parks and open spaces.
- 5.2.22 The extent to which development is prioritised on previously developed land or the extent to which it would minimise the effects on climate change and pollution are unclear as they would be dependent on specific location and design.

Social

5.2.23 No relationship was identified between this Strategic Objective and the crime, community facilities and health SA objectives. However, there is likely to be compatibility in terms of equalities due to the specific focus on ensuring the Borough is *'inclusive for all'*. Regarding housing, some conflict may arise in ensuring the housing needs of residents are met in terms of total housing provision and affordability and the aim to preserve and enhance existing buildings.

Economy

5.2.24 It is not envisaged there is a relationship between this Strategic Objective and the economic growth SA objective.

Diversity of Housing

Environment

5.2.25 The Strategic Objective's focus on housing delivery raises a degree of uncertainty in terms of compatibility with the majority of the environmentally focussed SA objectives. Significant new development has the potential to place additional pressures on the local environment. Specific mention to deliver high quality homes, and in particular homes *"built for adaptability"* should result in compatibility with the energy efficiency SA objective to encourage energy efficiency through building design. The extent to which this Strategic Objective would be compatible with the other environmentally focussed SA objectives can not be effectively determined at this level.

Social

5.2.26 A focus on the variety of housing appropriate to need and demand is compatible with the Borough meeting the housing needs of its residents and also the equalities SA objectives to encourage social inclusion, equity and the promotion of equality.

Economy

5.2.27 It is not envisaged that there is a relationship between this Strategic Objective and the economic growth SA Objective.

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Respecting Environmental Limits

Environment

- 5.2.28 This Strategic Objective is compatible with the environmentally focussed SA objectives. Its particular focus on climate change mitigation and adaptation elements including a variety of measures to reduce the risk of flooding is likely to result in a significant positive effect for the climate change and flood risk SA objectives. Specific mention of protecting and encouraging biodiversity, carefully managing waste and reducing and controlling noise within the Borough result in compatibility with the biodiversity, waste and pollution SA objectives.
- 5.2.29 Delivery of carbon neutral developments, highlighting the potential of a district heat and power network and a focus on waste reduction and the waste hierarchy should result in compatibility with the air quality, pollution, waste and energy efficiency SA objectives.
- 5.2.30 It is unclear if the Strategic Objective is compatible with the cultural heritage SA objective to reinforce local distinctiveness, or whether development would be prioritised on previously developed land.

Social

5.2.31 This Strategic Objective is unlikely to have any relationship with the socially focussed SA objectives.

Economy

5.2.32 It is not envisaged that there is a relationship between this Strategic Objective and the SA objective on economic growth.

Results of the Strategic Objectives appraisal

5.2.33 Generally the appraisal has highlighted that the majority of Strategic Objectives and SA objectives are compatible, however there are also many uncertainties. Most of the uncertainties in the appraisal surrounding the compatibility of objectives include the need for greater detail on development proposals and in terms of specific detail and design, for example, reducing pollution and prioritising development on previously developed land to determine compatibility.

5.3 Core Strategy Spatial Strategy and Places

- 5.3.1 The section presents the appraisal of the Core Strategy's Spatial Strategy and Places.
- 5.3.2 **Table 15** presents the results of the appraisal.

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Table 15: Spatial Strategy and Places Appraisal

		SA Objectives								Spa	tial Strate	egy & Places	-						
			Quanta of Development	Places	North Kensington	Kensal	Golborne / Trellick	Portobello / Notting Hill	Westway	Latimer	Earl's Court	Kensington High Street	South Kensington		Knights- bridge	King's Road / Sloane Square	Notting Hill Gate	Fulham Road	Lots Road / World's End
	1.	Biodiversity	0	+	0	+	++	0	+	0	+	0	0	0	0	0	+	+	+
	5.	Climate change	0	0	0	++	++	0	0	+	++	0	0	0	0	0	+	0	+
	6.	Flood risk	0	0	0	?	0	0	0	0	0	0	0	0	0	?	0	?	0
	7,	Air quality	0	0	0	0	+	0	+	+	+	+	+	+	+	+	+	+	+
Environment	8.	Parks & open spaces	+	+	0	+	++	0	+	+	+	++	++	+	+	+	+	+	++
ron	9.	Pollution	0	0	0	+	0	0	+	?	+	+	0	+	+	+	+	0	+
Envi	9a.	Previously developed land	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+
	10.	Transport	+	+	+	++	++	+	+	+	++	+	+	+	+	++	+	++	++
	11.	Waste	0	0	0	++	+	+	0	0	0	0	0	0	0	0	0	0	+
	14.	Energy efficiency	0	0	0	+	+	0	0	0	++	0	0	0	0	0	+	0	0
	16.	Cultural heritage	0	+	0	++	.++	+	0	0	++	++	##	+	++	+	++	+	++
	2.	Crime	0	0	0	0	+	0	++	?	0	0	0	0	0	0	?	0	+
a	4.	Equalities	0	0	++	+	+	0	+	+	0	1 (+)	+	0	+	+	0	0	+
Social	12.	Community facilities	+	+	+4	+	+	+	+	++	+	+	+	+	+	+	+	+	+++
S	13.	Housing	++	+	++	++	+	+	+	+	++	+	+	+	+	+	+	+	+
	15.	Health	0	0	+	+	+	+	+	?	+	0	0	+	0	+	0	+	+
Economy	3.	Economic growth	+	+	+	++	+	++	+	+	+	++	+	+	++	++	+	+	+

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Quanta of Development

- 5.3.3 There are positive impacts identified for the parks and open spaces and transport SA objectives. This is based on identified infrastructure requirements for a new area of public open space to be provided in the Earl's Court area as part of the Warwick Road development and planning for a Crossrail station at Kensal. Some other examples of infrastructure requirements as provided in Chapter 37 that are likely to have positive impacts on environmental SA objectives include CCHP and on-site waste management; canal environmental improvements; public realm improvements and pedestrian and cycle links. It is assumed that the Development Management Policies, if fully implemented, for the development of new housing, office floorspace, retail floorspace and infrastructure would not lead to any negative impacts on the remaining environmental SA objectives.
- 5.3.4 Significant positive impacts are shown for the housing SA objective as a result of the Council planning to deliver 600 new units a year from 2011/12, which exceeds the revised London Plan housing target figure of 585. Positive impacts are expected for the community facilities SA objective based on the identified infrastructure requirement for the provision of a new academy in North Kensington. Some other examples of infrastructure requirements as provided in Chapter 37 that are likely to have positive impacts on social SA objectives include provision of additional GPs or health premises; affordable housing; play space and play equipment; community hall / youth facility; premises for police and safer neighbourhood's team and additional gypsy and traveller pitches. It is assumed that the Development Management Policies, if fully implemented, for the development of new housing, office floorspace, retail floorspace and infrastructure would not lead to any negative impacts on the remaining social SA objectives.
- 5.3.5 Positive impact is expected for the economic growth SA objective based on meeting forecast demand for office floorspace and identified need for retail floorspace. Overall identified infrastructure requirements will also contribute to improving economic growth.

Policy	Recommendations
CP 1: Core Policy: Quanta of Development	 Policy requires clarification on period of time for the provision of office floorspace. Acknowledge Chapter 37 Infrastructure within the policy wording and that infrastructure requirements will be reviewed as part of the regular review process.

Places

- 5.3.6 The Places policy is likely to have positive impacts on biodiversity, parks and open spaces, transport and cultural heritage environmental SA objectives due to its emphasis on protecting, promoting and enhancing the local distinctiveness, improving character and quality of the Borough's Places.
- 5.3.7 The policies' emphasis on improving the quality and the way Places function is likely to have positive impacts on the community facilities and housing social SA objectives and economic growth.

Policy	Recommendations
CP 2: Places	 Paragraph 4.4.5 – should reference be to Section 2(a)? Could additionally specify "…and the way they function <i>for all that live, work, study in or visit the Borough.</i>"

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North Kensington

- 5.3.8 The North Kensington policy is likely to have a positive impact on the transport SA objective due to the possible inclusion of a Crossrail station at Kensal as mentioned in the supporting text. Neither the policy nor the supporting text directly refers to any opportunities that would have certain positive impacts on the remaining environmental SA objectives.
- 5.3.9 The policy seeks to stimulate regeneration of North Kensington which has been a persistent area of deprivation; provide new community facilities such as a school and healthcare; and there is scope for the development of 2,500 new houses and estate renewal at Wornington Green. Significant positive impacts are likely for the equalities, community facilities and housing SA objectives and a positive impact for the health SA objective.
- 5.3.10 A positive impact is shown for the economic growth SA objective due to the policy's emphasis on ensuring opportunities for change and delivering the widest possible regeneration benefits. The supporting text also mentions the scope for the Kensal development to be of mixed use and provide jobs in business and retail for local people.

Policy	Recommendations
CP 3: North Kensington	• Could additionally specify in the policy that the Council will regenerate and develop North Kensington in a sustainable way, in order to achieve sustainable development outcomes.

Kensal

5.3.11 Kensal as a place has shown significant positive impacts for the climate change, transport, waste and cultural heritage environmental SA objectives and positive impacts for the majority of remaining environmental SA objectives. The impact on the flood risk SA objective is uncertain. Development close to the canal in the area should consider the natural forces of the canal in development. The majority of social SA objectives showed positive impacts with significant positive impacts shown for the housing SA objective. The economy SA objective showed a significant positive impact.

Policy	Recommendations
CP 4: Kensal	 Paragraph 5.1.9 – should reference be to Chapter 20? 'Respecting Environmental Limits' is listed as the most important priority for action for Kensal, but the environment has not been recognised in the policy. Development at Kensal is aiming for an exemplar of environmentally responsive development. Recommendations to Priorities for Action supporting policy text: Consider mentioning that proposals for major development along the Blue Ribbon Network must be accompanied by a safety and risk assessment in accordance with policy 4C.15 of the London Plan. Consider mentioning that air quality will be improved by encouraging proposals and the design of solutions that improve air quality and cross-reference to policy CE 5 Air Quality. Development close to the canal in the area should consider the natural forces of the canal in development e.g. flooding, erosion, etc.

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Golborne / Trellick

5.3.12 The potential opportunities for Golborne / Trellick have shown positive impacts for the majority of environmental SA objectives with significant positive impacts for the biodiversity, climate change, parks and open spaces, transport and cultural heritage SA objectives. All the social SA objectives showed positive impacts. The economy SA objective showed a positive impact.

Policy	Recommendations
CP 5: Golborne / Trellick	 'Renewing the Legacy' is listed as the most important priority for action for Golborne / Trellick and, although regeneration is mentioned within the policy, preserving the special architectural character and historic interest of the building has not been recognised. <i>Recommendations to Priorities for Action supporting policy text:</i> Biodiversity and green infrastructure enhancements should be specified in the infrastructure requirements.

Portobello / Notting Hill

5.3.13 The potential opportunities for Portobello / Notting Hill have shown positive impacts for the previously developed land, transport, waste and cultural heritage environmental SA objectives. The majority of social SA objectives showed positive impacts. The economy SA objective showed a significant positive impact.

Policy	Recommendation
CP 6: Portobello / Notting Hill	• N/A.

Westway

5.3.14 The potential opportunities for Westway have shown positive impacts for the biodiversity, air quality, parks & open spaces, pollution, previously developed land and transport SA objectives. The majority of social SA objectives showed positive impacts, with significant positive impacts shown against the crime SA objective. The economy SA objective showed a positive impact.

Policy Recommendation					
CP 7: Westway	• Policy could outline examples of the types of improvements within the policy.				

Latimer

5.3.15 Latimer as a place has shown positive impacts on climate change, air quality, parks & open spaces, previously developed land and transport SA objectives. The pollution environmental SA objective showed an uncertain impact. The uncertainty surrounds whether the dust and noise problems that are significant issues in this part of the borough because of the Hammersmith and City railway line (which is above ground), the Westway flyover, and the West Cross route will improve as they largely are out of the Council's control. The community facilities social SA objective has shown significant positive impacts, while the impact for the health objective is uncertain. The uncertainty for the health SA objective is surrounding whether health facilities, in terms of healthcare, will be required and included among community facilities in the area, however it is recognised that the sport and recreation offer in Latimer would contribute to overall health and well-being. The crime SA objective has shown uncertain impacts, due to lack of mention of whether the area is considering measures to improve community safety. The economy SA objective showed a positive impact.

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Policy	Recommendations
CP 8: Latimer	 'Renewing the Legacy' and 'An Engaging Public Realm' are listed as the most important priorities for action for Latimer, but improved connectivity within the area, visual improvements and improvement in the provision of open space have not been recognised in the policy. Recommendations to Priorities for Action supporting policy text: Investigate the role the Council and others such as TfL could play in reducing dust and noise problems in the Latimer area. If healthcare provision is to be included in the community facilities for this place this should be mentioned in supporting text, however it is acknowledged that this is mentioned in infrastructure needs. The area contains Notting Barns ward which has shown in terms of crime deprivation some areas within the ward that contain high levels of crime. We would encourage the inclusion of community safety improvements to the area.

Earl's Court

5.3.16 The potential opportunities for Earl's Court have shown significant positive impacts on climate change, parks and open spaces, transport, energy efficiency and cultural heritage environmental SA objectives and positive impacts for the majority of remaining environmental SA objectives. Impacts on the biodiversity and waste SA objectives are likely to be enhanced through implementation of the Biodiversity and Waste policies. The housing social SA objective has shown significant positive impacts for the potential to contribute to the delivery over 2,000 dwellings in the area; however it is acknowledged that establishing the exact capacity is dependent on further detailed work on transportation accessibility. Positive impacts are also shown for the community facilities and health SA objectives. The economy SA objective showed a positive impact.

Policy	Recommendations				
CP 9: Earl's Court	 Recommendations to Priorities for Action supporting policy text: Green infrastructure enhancements should be specified in the infrastructure requirements. There is an identified area of flood risk (flood zone 2 & 3) located adjacent to the area within the London Borough of Hammersmith & Fulham boundary (west). Any development in this area needs to consider the potential flood risk. Also cross-reference to policy CE 2 Flooding. 				

Kensington High Street

5.3.17 The potential opportunities for Kensington High Street have shown positive impacts for the majority of environmental SA objectives. Significant positive impacts are shown for the parks and open spaces and cultural heritage SA objectives. Impacts on the biodiversity, climate change, energy efficiency and waste SA objectives are likely to be enhanced through implementation of the Climate Change, Biodiversity and Waste policies. The equalities, community facilities and housing social SA objectives showed positive impacts. The economy SA objective showed a significant positive impact.

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Policy	Recommendation
CP 10: Kensington High Street	 Recommendations to Priorities for Action supporting policy text: Consider the impact of increased traffic at the site (pedestrian and vehicular), if any, from increased visitor numbers and how this could be addressed in the context of both the site and the Kensington High Street Place. This could be emphasised in supporting text, however it is acknowledged that access improvements are mentioned in infrastructure needs.

South Kensington

5.3.18 The potential opportunities for South Kensington has shown significant positive impacts for the parks and open spaces and cultural heritage environmental SA objectives and shown positive impacts for the air quality, previously developed land and transport SA objectives. Impacts on the biodiversity, climate change, energy efficiency and waste SA objectives are likely to be enhanced through implementation of the Climate Change, Biodiversity and Waste policies. The equalities, community facilities and housing social SA objectives showed a positive impact. The economy SA objective showed a positive impact.

Policy	Recommendation
CP 11: South Kensington	• N/A.

Brompton Cross

5.3.19 Brompton Cross as a place has shown positive impacts for the majority of environmental SA objectives. Impacts on the climate change, energy efficiency and waste SA objectives are likely to be enhanced through implementation of the Climate Change and Waste policies. The community facilities, housing and health social SA objectives showed positive impacts. The economy SA objective showed a positive impact.

Policy	Recommendation				
CP 12: Brompton Cross	 'Renewing the Legacy' is the second most important priority for action for Brompton Cross, but listed buildings of great local significance that establishes the sense of identity have not been recognised in the policy. 				

Knightsbridge

5.3.20 Knightsbridge as a place has shown positive impacts for the majority of environmental SA objectives and significant positive effects for the cultural heritage SA objective. Impacts on the biodiversity, climate change, energy efficiency and waste SA objectives are likely to be enhanced through implementation of the Climate Change, Biodiversity and Waste policies. The community facilities and housing social SA objectives showed a positive impact. The economy SA objective showed a significant positive impact.

Policy	Recommendation			
CP 13: Knightsbridge	• N/A.			

King's Road / Sloane Square

5.3.21 King's Road / Sloane Square a place has shown positive impacts for the majority of environmental SA objectives and significant positive impacts for the transport SA objective due to

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possible establishment of new underground stations (dependent on impacts of such stations on the King's Road and surrounding area). There are uncertain impacts for the flood risk SA objective. Impacts on the climate change, energy efficiency and waste SA objectives are likely to be enhanced through implementation of the Climate Change and Waste policies. The majority of social SA objectives showed positive impacts. The economy SA objective showed a positive impact.

Policy	Recommendations			
CP 14: King's Road / Sloane Square	 'Better Travel Choices' and 'Keeping Life Local' are listed as the second and third most important priorities for action for King's Road / Sloane Square, but ease of access to the centre and meeting the day-to-day shopping and other needs of residents in the area have not been recognised in the policy. <i>Recommendations to Priorities for Action supporting policy text:</i> There is an identified area of flood risk (flood zone 2 & 3) located in the area adjoining the Thames to the south. Any development in this area needs to consider the potential flood risk. Also cross-reference to policy CE 2 Flooding. 			

Notting Hill Gate

5.3.22 Notting Hill Gate as a place has shown positive impacts for the majority of environmental SA objectives and significant positive impact on the cultural heritage SA objective. Impact on the Waste SA objective is likely to be enhanced through implementation of the Waste policy. The community facilities and housing social SA objectives showed a positive impact. The crime SA objective has shown uncertain impacts, due to lack of mention of whether the area is considering measures to improve community safety. The economy SA objective showed a positive impact.

Policy	Recommendations					
CP 15: Notting Hill Gate	 'An Engaging Public Realm' and 'Better Travel Choices' are jointly listed as the third most important priorities for action for Notting Hill Gate, but improving the pedestrian environment and ease of access around the centre have not been recognised in the policy. This is particularly important given that the policy endorses high trip generating uses. <i>Recommendations to Priorities for Action supporting policy text:</i> The area contains Pembridge ward which has shown in terms of crime deprivation some areas within the ward that contain high levels of crime. We would encourage the inclusion of community safety improvements to the area. 					

Fulham Road

5.3.23 The potential opportunities for Fulham Road have shown positive impacts for the biodiversity, air quality, parks & open spaces, previously developed land and cultural heritage environmental SA objectives. A significant positive impact is shown for the transport SA objective. However, there are uncertain impacts shown for the flood risk SA objective. This uncertainty surrounds the potential flood risk to the area. The community facilities, housing and health social SA objectives showed positive impacts. The economy SA objective showed a positive impact.

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Policy	Recommendations			
CP 16: Fulham Road	 'An Engaging Public Realm' is listed as the second most important priority for action for Fulham Road, but improving the public realm and exploring the use of Brompton Cemetery for passive recreational use have not been recognised in the policy. The policy in general lacks detail. <i>Recommendations to Priorities for Action supporting policy text:</i> There is an identified area of flood risk (flood zone 2 & 3) located toward the London Borough of Hammersmith & Fulham boundary (south west corner of the area). Any development in this area needs to consider the potential flood risk. Also cross-reference to policy CE 2 Flooding. 			

Lots Road / World's End

5.3.24 Lots Road / World's End as a place has shown significant positive impacts for the parks and open spaces, transport and cultural heritage environmental SA objectives. Positive impacts are shown for the majority of remaining environmental SA objectives. The majority of social SA objectives showed positive impacts. The community facilities social SA objective showed significant positive impact. The economy SA objective showed a positive impact.

Policy	Recommendations					
CP 17: Lots Road / World's End	• 'Keeping Life Local' is listed as the third most important priority for action for Lots Road / World's End, but the need for higher quality local shopping and social and community uses such as healthcare have not been recognised in the policy.					

Results of the Spatial Strategy and Places policies appraisal

- 5.3.25 Overall it can be expected that the Spatial Strategy and Places policies will contribute positively to sustainable development. In particular, each Place contains a clearly presented Vision and Priorities for Action that should contribute to providing a locally distinctive approach to addressing issues and providing direction on the future evolution of a particular Place.
- 5.3.26 The Places in the Core Strategy are set out providing an introduction that describes its basic issues, a vision to guide its future evolution, priorities for action for the Council and partners (set out under the Strategic Objectives for the Core Strategy) and delivery including a policy to guide development management decisions. However, it is felt that some of the Places policies themselves (in terms of policy text) could more clearly incorporate the important priorities for action.

5.4 Core Strategy Strategic Sites

- 5.4.1 This section provides the appraisal of seven Core Strategy Strategic Sites.
- 5.4.2 **Table 16** presents a summary of the results of the appraisal with a more detailed appraisal contained in **Appendix 3**.

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Table 16: Strategic Sites Appraisal

SA Objectives		A Objectives	Core Strategy Strategic Sites						
			Kensal Gasworks	Wornington Green	Land adjoining Trellick Tower	North Kensington Sports Centre	The former Commonwealth Institute	Warwick Road	Earl's Court
	1.	Biodiversity	+	+	?	?	?	?	+
	5.	Climate change	++	+	?	?	?	+	++
	6.	Flood risk	0	0	0	0	0	0	?
	7.	Air quality	+	0	?	?	?	?	+
ent	8.	Parks & open spaces	+	+	0	?	?	+	+
muc	9.	Pollution	+	0	?	?	?	0	?
Environment	9a.	Previously developed land	+	++	++	++	+	+	+
	10.	Transport	+	+	?	?	?	+	+
	11.	Waste	++	0	?	0	?	?	0
	14.	Energy efficiency	++	+	+	?	+	?	++
	16.	Cultural heritage	0	0	++	0	+	0	+
	2.	Crime	+	+	+	+	?	+	?
a	4.	Equalities	+	+	?	+	+	+	+
Social	12.	Community facilities	++	+	+	++	+	+	+
	13.	Housing	++	+	+	+	?	++	+
	15.	Health	+	+	+	+	0	+	+
Economy	3.	Economic growth	+	++	+	?	+	+	+

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Kensal Gasworks

Environment

- 5.4.3 The potential for the sites to deliver a *'high-density development which meet a high standard of environmental sustainability'* should ensure a positive outcome particularly for the climate change, waste and energy efficiency SA objectives.
- 5.4.4 In response to the site's expectation to deliver an environmentally responsive medium rise high density development of upwards of 2,500 dwellings in close proximity to good public transport this should ensure a significantly positive outcome for minimising the effects on climate change. The potential to provide on-site waste management facilities, including a recycling sorting facility and/or anaerobic digestion, should enable a significantly positive outcome for the waste SA objective. The outcome for the energy efficiency SA objective is also likely to be significantly positive with the reuse of the on-site Sainsbury's, implementation of good building design and a 'must' for a high environmental standard of development (including construction, building materials, waste management, and energy usage/retention) and the provision of a Combined Cooling, Heating and Power (CCHP) or similar with potential to join a wider network in the future.
- 5.4.5 The focus on improved public realm around the canal side should ensure that the proposal performs well against the parks and open spaces SA objectives, with planning obligations for landscaping and amenity improvements to the Grand Union Canal. There are likely to be positive impacts on biodiversity through carefully managing development in terms of existing biodiversity and encouraging biodiversity creation. It has been noted that Borough Grade I and II Sites of Nature Conservation Importance and green corridors exist on site, notably along the railway and the canal and therefore development should be carefully managed. The allocation also mentions that ways to create biodiversity should also be considered.
- 5.4.6 The decommissioning of the gas holders and land decontamination should improve the environmental quality of the area, when undertaken, and hence enable a positive outcome for the SA objective on pollution.
- 5.4.7 Although the site does not contain any areas of flood risk zone 2 or 3, it was identified to have a risk of surface water flooding in the sequential test and this will require mitigation. The allocation mentions that the site has subsequently passed the sequential test as required by PPS25.
- 5.4.8 The site is poorly connected to existing public transport infrastructure, particularly at the western end of the site and the successful delivery of 2,500 or more new dwellings is dependent on the provision of a Crossrail station. A Crossrail station, improvements to bus services or other improved public transport providing realistic alternative sustainable transport choices should help achieve positive outcomes for the air quality and transport SA objectives. Improved accessibility northwards to Kensal Green and south across the mainline railway would also contribute positively to these SA objectives.

Social

5.4.9 The site surroundings contain high levels of employment, income and housing deprivation and this is reflected in the understanding that the availability of the Kensal Gasworks site holds the key to significant regeneration in North Kensington. The provision of social and community uses at the site and improvement to the quality of the public realm, as well as the identified infrastructure and planning obligations requirement for affordable housing contribution should help deliver a significant positive response to the Social SA objectives, particularly the social and community uses and housing.

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- 5.4.10 An improved public realm, with increased permeability both north and south of the site combined with likely increased footfall including additional social and community uses (police) should help achieve a positive outcome for the SA objective that aims to reduce crime and the fear of crime.
- 5.4.11 Provision of improved accommodation in addition to social and community facilities (including health, education and police) to meet local needs with the addition of over 2,500 new dwellings, should have a positive impact on equalities and health SA objectives.

Economy

5.4.12 Any provision of additional retail and business space (including 10,000m² of offices) would help improve the diversity and vibrancy of the local economy. This would be further enhanced by the provision of improved transport infrastructure enabling greater accessibility to the site. However, the attraction of leisure, education and business uses to the site cannot be guaranteed and will depend upon the planned improved connections to the railway, canal and public realm.

Policy	Recommendation
CA 1: Kensal Gasworks	• N/A.

Wornington Green

Environment

- 5.4.13 Overall, the proposed redevelopment at Wornington Green should deliver positive environmental improvements to the site, particularly given the infrastructure and planning obligations to, among others, reinstate an improved Athlone Gardens and improve walking and cycling accessibility are delivered. The identified need for a site management plan should ensure protection of the tree preservation orders in the north west of the site; and the reprovision of an improved park should enable a positive outcome for the biodiversity and parks and open spaces SA objectives. A commitment to undertake redevelopment as quickly as possible and maintain good quality open space throughout the construction period should also help maintain good local environmental quality.
- 5.4.14 The extent to which effects on climate change would be reduced are dependent on detailed design, however; meeting the Decent Homes Standard (currently not being met), in addition to CCHP or similar provision, should deliver positive benefits against the climate change and energy efficiency SA objectives.
- 5.4.15 Although the site does not contain any areas of flood risk zone 2 or 3, it was identified to have a risk of surface water flooding in the sequential test and this will require mitigation. The allocation mentions that the site has subsequently passed the sequential test as required by PPS25.
- 5.4.16 The identified infrastructure and planning obligations requirement for permit free parking may encourage greater car ownership. However, there are infrastructure and planning obligations identified for mitigation for any negative transport impacts and improvements to public transport arising from development, including improvements to the bus infrastructure. The latter infrastructure and planning obligation is likely to have a positive outcome on the transport SA objective.

Social

5.4.17 This site and its surroundings are within the top 10% of employment, income, housing and crime deprivation and multiple deprivation nationally. Hence, the proposed redevelopment - with provision of leisure and community facilities and education facilities - could help address these issues.

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- 5.4.18 The specific redevelopment priority to keep the community together, in addition to the identified infrastructure and planning obligations and proposals for improved social and community infrastructure, should help facilitate greater social inclusion and community cohesion and result in positive outcomes for the equalities and social and community facilities SA objectives. Provision of open space for the construction period should sustain community needs in the interim and minimise disruption. Improvements in the building fabric to Decent Homes Standards and additional housing provision (both private and affordable) should assist the Royal Borough in meeting its housing need and the needs of residents and result in a positive outcome for the housing SA objective.
- 5.4.19 The provision of a Safer Neighbourhood Police Base in the area, if required, should help reduce crime and the fear of crime.

Economy

5.4.20 The proposed leisure and community facilities and the identified construction training contribution should provide some stimulus to the local economy and result in a positive response towards supporting the local economy and fostering economic growth. This positive effect should be further enhanced by provision of 2,000m² A1 to A5 uses; extending the retail offer and improving the street frontage and connectivity.

Policy	Recommendation
CA 2: Wornington Green	 Recommendations to Allocation supporting policy text: Site potential for improving waste management should be considered.

Land adjacent to Trellick Tower

Environment

- 5.4.21 The development of this site contains little information to appraise its impact on many of the environmental SA objectives. However, there should be a strong positive impact on the SA objective to conserve and enhance cultural heritage, through the restoration and enhancement and of Trellick Tower a Grade II* listed building. This includes development of the surrounding land and thus the local environmental quality and distinctiveness should also benefit significantly.
- 5.4.22 A significant positive outcome may also be anticipated for the prioritising development on previously developed land SA objective and positive outcome for the SA objective to encourage energy efficiency. There are no identified environmental constraints on the site, although the there are Grade II* listed buildings adjoining the north and west sides of the site and a local Site of Importance for Nature Conservation adjoining the north of the site.
- 5.4.23 The site has low flood risk.

Social

5.4.24 The delivery of a minimum of 60 residential units to fund regeneration including improvements to social and community facilities (including a new health facility) is likely to bring positive outcomes for the crime, equalities, social and community facilities, housing and health SA objectives. In particular, a positive impact would be more certain if the potential for additional dwellings, leisure facilities and social and community uses (new health facility) is achieved. The establishment of a trust fund should assist in supporting social needs. The development site is within the top 10% in terms of crime, housing, income deprivation and multiple deprivation and, therefore, positive redevelopment at the site should deliver beneficial improvements to the local community.

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Economy

5.4.25 The proposal to accommodate studio workspace units, as identified in the allocation section, would be likely to help increase economic growth in the immediate area. The extent to which it diversifies the local economy would be dependent upon the nature of business take-up.

Policy	Recommendation
CA 3: Land Adjacent to Trellick Tower	 Recommendations to Allocation supporting policy text: Identified constraint adjoining the site (local Site of Importance for Nature Conservation) should be considered in any design of the new development.

North Kensington Sports Centre

Environment

- 5.4.26 The proposed allocation of development on the site contains few references to environmental constraints. The proposed development is likely to include development on previously developed land; however, the extent of development on the existing open space is unclear. However, there is allocation for open space in the form of external sports facilities, which should be shared with the sports centre. The potential that land contamination exists on site should be addressed as part of any development. No details are provided on the management of the Grade II listed building to the north of the site.
- 5.4.27 The site has relatively poor transport accessibility, particularly with regards to the existing road network. An improved street network and better permeability would be required if a new secondary school were to be provided on the site, however; depending on the delivery of the identified infrastructure and planning obligations towards improving public transport infrastructure, there could be a trend towards greater personal car use in the area. The site is at high risk of surface water and sewerage flooding as determined by the sequential test, but is likely to be acceptable, provided approved mitigation techniques are proposed for surface and sewer water flooding. The allocation mentions that the site has passed the sequential test as required by PPS25.
- 5.4.28 It is not clear as to the likely sustainability credentials of the proposed new infrastructure. A positive outcome for the climate change and energy efficiency SA objectives should result from, incorporation of CCHP or similar; and the design of the new or remodelled public sports centre should incorporate energy efficient design standards and construction although this is not specified.

Social

5.4.29 The proposed site development has a strong positive social element including a new secondary school with sports facilities and the existing public sports centre may be retained in situ so they are more easily accessible by the community should result in positive outcomes for all the Social SA objectives. The site surroundings are in the top 10% nationally of crime, housing, and multiple deprivation and positive development in the area should help improve housing availability and potentially reduce crime and fear of crime through greater footfall and improved street network permeability. Planting and landscaping is expected to improve the visual amenity of the surrounding properties which should be to the benefit of the urban environment, housing and community well-being.

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Economy

5.4.30 Although the economic implications for this site are unclear at this stage, the Latimer area contains other operational and commercial properties which could benefit from this proposal and the new school and additional/enhanced sports facilities could provide a small number of new jobs.

Policy	Recommendation
CA 4: North Kensington Sports Centre	 Recommendations to Allocation supporting policy text: Mention that remodelling and/or new development will incorporate the principles of sustainable design and construction. Assess level of land contamination, if any, and how this could be addressed through the allocation.

The former Commonwealth Institute

Environment

- 5.4.31 Reuse and enhancement of the existing 'tent' building with the aim to develop it into a high trip generating public arts and cultural use should result in positive outcome for the SA objectives on previously developed land, energy efficiency and cultural heritage. The degree of positive performance will be dependent upon the detailed project plans. The number of Grade II* listed buildings and registered parks and gardens and conservation areas in and around the site could be impacted upon negatively by increased visitor numbers, or alternatively could benefit from increased investment and interest in the area this would be dependent upon appropriate planning.
- 5.4.32 There is uncertainty regarding the impact of the proposed development on local biodiversity and the natural environment, however, the identified constraints of the site (such as those mentioned above) should ensure any development is delivered in the context of fully understanding the local environment. A number of trees on the site are protected by Tree Preservation Orders and are also identified as constraints to be considered when planning for any development. The extent to which the project will contribute to reducing effects on climate change, reduce pollutants and reduce waste is unknown; however, efforts should be made to discourage visitors travelling to the Institute by car. The major planning application at the site proposes car and motorcycle parking, and it is unclear to what extent the use of sustainable forms of transport and lowered car dependency would be promoted.
- 5.4.33 The site has a low risk of flooding.

Social

5.4.34 The site should help contribute to positive improvements on the SA objectives on equalities and social and community facilities, assuming that the facilities are open and accessible to all. Additional residential or commercial development could contribute partly towards the Borough's housing and social needs, particularly if the planning application is granted for retail, restaurant and cafe, office, storage and ancillary uses, two residential buildings and one mixed use building. The proposed mixed use building includes several facilities of benefit to residents in terms of community and social well-being, such as a cinema, fitness centre and swimming pool. Impacts of the development on local crime levels are uncertain.

Economy

5.4.35 The site proposal should have positive impacts on employment and the local economy, however, the extent to these impacts is uncertain at this stage. Potential additional commercial (or

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residential) development could positively contribute towards the Borough's economy by generating more jobs, employees and residents looking to use local services. In particular, if the current planning application (or a similar application) goes ahead, this includes facilities for economic benefit such as: retail, restaurant and cafe, office, storage and ancillary uses, cinema, fitness centre and swimming pool.

Policy	Recommendation
CA 5: Allocation for The former Commonwealth Institute	 Recommendations to Allocation supporting policy text: Consider the impact of increased traffic at the site (pedestrian and vehicular), if any, from increased visitor numbers and how this could be addressed in the context of both the site and the Kensington High Street Place

Warwick Road

Environment

- 5.4.36 The five sites including 100 West Cromwell Road propose a variety of development including: a minimum of 1,700 residential units, associated infrastructure for community and social uses, and on-site public open space and amenity space provision. This should result in positive effects on the parks and open spaces and previously developed land SA objectives, particularly given that site specific infrastructure and planning obligations have been identified for public open space and landscaping improvements.
- 5.4.37 Infrastructure and planning obligations for pedestrian and cycle improvements and the intention to deliver necessary infrastructure should promote traffic reduction and encourage the use of sustainable forms of transport.
- 5.4.38 Building a 'coordinated sustainable development' should minimise effects on climate change, although specific mention of the requirements for sustainable design and construction is a noticeable omission from the 'Principles' given the combined size of the proposed development. It is also unclear how waste will be treated.
- 5.4.39 The site contains areas of high risk for surface and sewerage water flooding according to the sequential test and will require mitigation. The allocation mentions that the site has passed the sequential test as required by PPS25.

Social

5.4.40 The development should contribute significantly to the Borough's housing target and will aim to create a sustainable and high-quality environment, therefore having a positive effect on the housing SA objective. The identified infrastructure and planning obligations focus on the provision of community and social infrastructure including a primary school, crèche, affordable housing, health facilities and social and community facilities amongst others. Based on this, delivery of the development at the Warwick Road sites is likely to have positive effects on the SA objectives for equalities, social and community facilities, healthcare and housing. The area experiences high levels of housing deprivation and therefore measures to increase housing delivery in this area are welcomed. The design of the development to consider community safety and an infrastructure and planning obligation to provide floorspace for a Safer Neighbourhoods unit, should help reduce crime and anti-social behaviour.

Economy

5.4.41 The proposed developments would cumulatively deliver a variety of retail, leisure, community and business use facilities which should aid in supporting and developing the local economic base.

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Policy	Recommendation
CA 6: Warwick Road	 Identify that sustainable design and construction will be a principle of the development and that it will maximise the opportunities of scale that the combined site offers. <i>Recommendations to Allocation supporting policy text:</i> Site potential for improving waste management should be considered. Assess level of land contamination, if any, and how this could be addressed through the allocation.

Earl's Court

Environment

- 5.4.42 The site will be developed on previously developed land and although there is little comment with regards to the natural environment, however it is stated in the infrastructure and planning obligations the requirement for additional open space, including considering opportunities to create biodiversity and the allocation mentions that development around the grade I Registered Park and Garden of Historic Interest should be carefully managed. This should support the SA objectives to conserve and enhance the natural environment and biodiversity and to protect and enhance the Royal Borough's parks and open spaces as the whole site and its surrounds are identified as 'open space deficient'. Furthermore, the design should take into account the local context, conservation areas, residential amenity and views, which should have a positive impact towards reinforcing local distinctiveness, environmental quality and conserving and enhancing cultural heritage.
- 5.4.43 The continued use as an exhibition centre as well as provision of office space and residential units has identified the opportunity for establishing a CCHP or similar as part of district heating scheme which would help minimise the proposed development's impacts on climate change and have significant positive impacts for the climate change and energy efficiency SA objectives. The identified infrastructure and planning obligation to help unravel the Earl's Court One Way System and improve traffic circulation should help reduce congestion, improve local environmental quality and potentially reduce local air pollution and improve air quality. However, improving the transport infrastructure and capacity will be highly challenging and this can not be commented upon with certainty, although the above obligations have been identified.
- 5.4.44 The provision of on-site waste treatment including recycling facilities and/or anaerobic digestion should have a positive impact on the waste SA objective.
- 5.4.45 The site contains a high risk of surface water and sewerage flood risk as identified in the sequential test and will require mitigation. The allocation mentions that the site has passed the sequential test as required by PPS25 and the exception test would have to be undertaken.

Social

- 5.4.46 Continued use of Earl's Court as a cultural facility should enable a positive effect on the equalities SA objective if accessible to all members of society. Delivery of residential units would help in meeting the housing needs of the Borough's residents in an area in the top 10% most deprived in terms of housing deprivation. The infrastructure and planning obligations has identified the requirement for affordable housing and should help deliver a positive response to the housing SA objective.
- 5.4.47 As a mixed-use development, the site should also provide education, health, public open space, community facilities and shops for day-to-day needs. In addition to the infrastructure and planning obligations for community, health, education and public open space contributions; there

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should be a positive social impact generally, particularly for social and community facilities and accessible health care.

5.4.48 The extent to which crime would be reduced is not clear.

Economy

5.4.49 The proposed development should help support the local economy, in particular if the potential for office space provision is realised. Just to the south of the site lies an area in the top 10% most deprived in terms of employment and any additional job creation in the area should help improve this situation. New employment, hotels, leisure, offices, and associated facilities, as part of the wider Earl's Court site, should also have a positive impact on local economy.

Policy	Recommendation
CA 7: Allocation for Earl's Court	• N/A.

Lots Road Power Station

5.4.50 Lots Road Power Station has not been allocated as a strategic site in the Core Strategy and therefore does not require Sustainability Appraisal.

Results of the Strategic Sites appraisal

- 5.4.51 The appraisal has shown that the majority of Strategic Sites will contribute positively to sustainable development objectives in order to satisfy the requirements of the Core Strategy, in terms of housing delivery and the provision of commercial floorspace and community facilities.
- 5.4.52 The Strategic Sites in North Kensington should tackle existing issues in terms of poor economic performance and socio-economic deprivation. It is thought that the Core Strategy is on course to successfully capitalise on these opportunities and address existing issues.
- 5.4.53 Three of the sites however, have shown many uncertainties in terms of performance against environmental SA objectives. This is mainly due to a lack of consistency and detail in the information provided for them in the Allocation section in comparison to other sites. However, it is anticipated this detail may be provided in Supplementary Planning Documents or Area Action Plans planned or prepared.

5.5 Development Management Policies

- 5.5.1 This section presents the appraisal of the performance of the Development Management Policies. The policies have been appraised individually and the performance of the policies has been discussed according to the grouping of policies under each Strategic Objective. Individual policies are highlighted when particular issues require further clarification.
- 5.5.2 In total, there are 38 strategic policies presented under the seven Core Strategy Strategic Objectives. The full list of policies is included in **Table 12**.
- 5.5.3 The SA of the Development Management Policies against the SA objectives is presented in **Table 17** and provides an overview of the performance of the policies against the SA objectives and identifies where the policies are or are not achieving the aims of the SA objectives.
- 5.5.4 A discussion on the performance of the Core Strategy Policies also refers to findings of the SA Update Report 2009 which identified three objectives where there were some baseline indicators

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that had shown to have worsened since the publication of the Sustainability Appraisal Scoping Report in 2005. These were:

- Objective 1. Biodiversity To conserve and enhance the natural environment and biodiversity;
- Objective 2. Crime Reduce crime and anti-social behaviour and the fear of crime; and
- Objective 13. Housing To aim that the housing needs of the Royal Borough's residents are met.

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Better Keeping Life Local Fostering Vitality Travel An Engaging Public Realm Renewing the Legacy Diversity of Housing Respecting Environmental Limits Choices Uses Strategic Policies pe of Bus tail De 븮 Biodiversity + . . . Climate Change . + + + . + Flood risk + D n + 7 Air quality + + + + + Parks & Open Spaces + + + Pollution Û + ÷ ÷ + ÷ n n Û 9a reviously developed land + D D Transport + + + * + Vaste Energy efficiency ÷ 16 Cultural heritage + + Crime + + + + + + + + . Equalities ö + + + + + + + + + + ocial Community facilities + + . + Ū Housing + n n Health ÷ ۰n n. ÷ n ÷ n n n

Table 17: Development Management Policies Appraisal

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5.6 Core Strategy Policies

Infrastructure Delivery and Planning Obligations

5.6.1 Generally speaking, the policy seeks that new development will be coordinated in Kensington and Chelsea with the provision of appropriate infrastructure to support development and that planning obligations will be sought where required to mitigate a development's impact. Therefore, by appraising the individual characteristics of each site - taking into account the nature, scale and location - this policy should generally have a neutral to positive effect on social, environmental and economic objectives through the delivery of infrastructure to meet new development needs and seeking compensation to any loss or damage created by a development through developer contributions. The exact benefits, however, are dependent upon the type of development, infrastructure and immediate area needs. In addition, the policy only seeks 'prescriptive, compensatory or mitigatory' measures, and hence could also aspire to enhance benefits in order to ensure a positive rather than a neutral impact.

Policy	Recommendation
C 1 – Infrastructure Delivery and Planning Obligations	 Look to 'enhance' and maximise benefit against the SA objectives, especially through objectives that require improvement as highlighted in the SA Update Report – Biodiversity, Crime and Housing and area priorities.

Keeping Life Local

- 5.6.2 The strategic objective for Keeping Life Local is "for strong, effective local centres and for social and community facilities to be widely available and for neighbourhood functions, including local shopping facilities, to be accessible so that residential communities can flourish".
- 5.6.3 Overall, the policies perform well against each of the environmental, social and economic SA objectives. Impacts are predominantly positive including some significant benefits identified, in particular against those objectives which have a climate change, social/community and economic focus. These include the SA objectives on climate change, air quality, transport equalities, community facilities, health and economic growth.
- 5.6.4 No policies were identified to result in an adverse impact on the SA objectives; however the effect on some SA objectives particularly surrounding plans for proposed development was unclear. As there is no detailed information within the policy or related supporting information specific to development or location, for example, whether development was to be prioritised on previously developed land or whether they would reduce waste or promote energy efficiency etc. the outcome of these policies could be either positive or negative dependent upon further information and implementation. One particular area highlighted by the appraisal is the uncertainty of meeting the housing SA objective due to its predominant focus on social and community infrastructure. However, given the difficulty of maintaining the present land bank for social and community use provision in the face of the Borough's high land values, it is considered that these policies' focus is justified. Similarly, the uncertainty of the nature of the new development is reflected in the Environmental SA objectives on biodiversity and previously developed land.

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Policy	R	ecommendation
CK 1 - Social and Community Uses	٠	N/A.
CK 2 - Local Shopping Facilities	-	
CK 3 - Walkable Neighbourhoods and Neighbourhood Facilities	-	

Fostering Vitality

- 5.6.5 The strategic objective for Fostering Vitality is that "the quality of life of our predominantly residential Borough is enhanced by a wide variety of cultural, creative and commercial uses which can significantly contribute to the well being of residents and to the capital's role as a world city".
- 5.6.6 Although development focussed, the policies perform well even against the environmentally focussed SA objectives. This is as a result of focus on development that is likely to be easily accessible by public transport. Locating development in areas with a PTAL score of 4 and above (e.g. policies such as Arts and Culture Uses and Location of Business Uses) should help to decrease reliance on car use and, consequently, have positive impacts on the climate change, pollution and air quality SA objectives. However, it is difficult to appraise the impact on biodiversity and open space SA objectives, given the limited availability of these resources in the Borough and the assumption that they will likely be protected and located away from the development of retail, businesses and hotels. This also resulted, generally speaking, in a positive – or potentially positive – impact against the previously developed land SA objective. particularly where re-use of previous employment areas and hotels are concerned. However, development on open space and ecologically and historically important sites should be avoided e.g. for policies on Hotels, Location of Business Uses and Location of New Shop Uses. This has resulted in a number of uncertainties against SA objectives for these policies, which is of particular concern for biodiversity given that the biodiversity evidence base indicator has worsened since the 2005 SA Scoping Report, although linking to the Biodiversity policy (CE 4) under 'Respecting Environmental Limits' could help to address this concern. It is also difficult to assess the likely impact of additional hotels on the SA objective for transport, which could be negative if resulting in increased road traffic e.g. coaches and car parking, although linking the Hotels policy (CF 8) to the Improving alternatives to car use policy (CT 1) under 'Better Travel Choices', could address this.
- 5.6.7 It was difficult to appraise the impact against waste and energy efficiency SA objectives, as the focus of the 'Fostering Vitality' policies primarily address the location and unit mix of shop uses, retail development and hotels, and so there were uncertainties for these policies. Promotion of sustainable design and construction and management of waste in, for example, new units for shops, businesses and hotels, could have a positive impact against these objectives, if considered within these policies (e.g. Location of New Shop Uses, Retail Development within Town Centres, Location of Business Uses, Arts and Cultural Uses, and Hotels). It should be noted, however, that the Waste and Climate Change policies under 'Respecting Environmental Limits' could be linked to the 'Fostering Vitality' policies, and thus result in a positive impact against these SA objectives if considered alongside policies for development location and mix of hotels and retail.

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- 5.6.8 Almost all the policies are considered to have a positive impact on the economic SA objective, by promoting the range and scale of the employment offer, particularly by focusing on the Borough's economic strengths e.g. in terms of hotels, retail, creative uses, arts and culture. Appropriately locating business uses (particularly considering enterprise size) and hotels where needed should also protect the residential character of the Borough's neighbourhoods, thus promoting equalities and housing objectives. However, the allocation of land for business in the Location of Business Uses policy could potentially have a negative impact on the housing SA objective particularly by resisting residential uses in employment zones, although the policy has measures in place to safeguard against loss of residential units from offices, and it would depend on how the policy is implemented and how well housing is catered for in other policies. This would need to be carefully monitored given that the baseline indicator for housing has worsened since the 2005 SA Scoping Report.
- 5.6.9 It was considered that a positive impact should be shown against the crime SA objective for improving the retail offer (e.g. the Location of New Shop Uses and Retail Development within Town Centres policies), by increasing the vitality of retail areas increases and reducing the derelict appearance that can be associated with crime. However, theft such as pick-pocketing can be a particular problem in busy tourist hotspots, and so the impact on the crime objective is less clear-cut, particularly for the policy: Street Markets, that looks to expand or support new provision. The baseline indicator for crime has worsened since the 2005 SA Scoping Report and so careful implementation of these policies would be important to ensure maximum improvement.
- 5.6.10 Policies that support the retail offer (e.g. Street Markets, Location of New Shop Uses, Retail Development within Town Centres) should promote the social SA objective of equalities through leisure and recreation opportunities for residents and associated community well-being, thus also scoring well against the community facilities objective. However, an uncertainty exists as to whether the SA objective to provide accessible healthcare would be negatively impacted by a focus on retail facilities in policies including Location of New Shop Uses and Retail Development within Town Centres policies. It is not clear whether the Location of New Shop Uses policy stating that *"an unacceptable impact on existing centres"* is to be avoided would safeguard existing provision. The Diversity of uses within Town Centres policy should however result in a positive outcome in terms of provision of healthcare facilities as it states that shops may not be protected if the proposal is to change to a *"social and community use"*.

Policy	Recommendations
CF 1 – Location of New Shop Uses	• Strengthen waste management strategy – cross-reference to
CF 2 – Retail Development within Town Centres	 policy CE 3 Waste. Avoid a negative impact on the health needs of residents - monitor impacts on crime, health and housing when provisioning for retail, hotel and business uses.
CF 3 – Diversity of Uses within Town Centres	 Avoid a negative impact on the health needs of residents - monitor impacts on crime, health and housing when provisioning for retail, hotel and business uses.
CF 4 – Street Markets	• N/A.
CF 5 – Location of Business Uses	 Maximise development on PDL and avoid development on green field, open space, ecologically and historically important land – cross-reference to appropriate policies. Avoid a negative impact on the housing and health needs of residents - monitor impacts on crime, health and housing
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Policy	Recommendations
	when provisioning for retail, hotel and business uses.
CF 6 – Creative and Cultural • Businesses	N/A.
CF 7 – Arts and Culture Uses •	N/A.
CF 8 – Hotels	green field, open space, ecologically and historically important land – cross-reference to appropriate policies.
CF 9 – The South Kensington Strategic • Cultural Area	N/A.

Better Travel Choices

- 5.6.11 The strategic objective for Better Travel Choices is that "walking, cycling and public transport are safe, easy and attractive and preferred by our residents to private car ownership and use".
- 5.6.12 In general, these policies are likely to provide a substantial environmental benefit as well as ensuring positive impacts on social inclusion and access through the provision of improved walking, cycling and public transport improvements.
- 5.6.13 Both policies focus on improving provision of, and access to, public transport whilst simultaneously discouraging the use of private car ownership. Hence they perform particularly well against the climate change, air quality and transport SA objectives.
- 5.6.14 Noticeable positive improvements are also likely for the biodiversity SA objective to conserve and enhance the natural environment and biodiversity.
- 5.6.15 The New Rail Infrastructure policy is likely to have a positive impact at the strategic level, however, in consideration of the policy detail; there is potential for negative impacts on the SA objective to prioritise development on previously developed land. The result of this would be dependent on the location of proposed new infrastructure and so the impact has been identified as uncertain.
- 5.6.16 Although a positive effect on the economic SA objective to support a diverse and vibrant local economy to foster sustainable economic growth is clearer for the Improving Alternatives to Car Use policy, both 'Better Travel Choices' policies are likely to have significant indirect economic benefits to the local communities and wider borough through improved connectivity and associated service provisions in those areas identified.
- 5.6.17 The Improving Alternatives to Car Use policy should have a positive impact on the health SA objective in terms of improving ability to access healthcare, it should generally have a good social impact (although not necessarily on a specific objective) in terms of health and wellbeing by encouraging walking and cycling. It should be noted that planning for alternative travel patterns should take into account the need for emergency vehicles to move more freely to reach casualties quickly. This policy should also have a positive impact on the economic SA objective

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by facilitating increased freight transport on the water and improving north-south access and the road network to the benefit of access for goods vehicles and customers / employees etc.

5.6.18 Although the Improving Alternatives to Car Use policy should on balance result in a positive outcome for the SA objective to encourage social inclusion, equity and the promotion of equality some uncertainty exists for specifying high trip generating development to be located in areas with a PTAL score of 4 or above. There is the potential that this policy could have an indirect negative impact on deprived areas where such development may be welcomed to aide regeneration. In other words, the requirement to meet a PTAL score of 4 or above may discourage development in more transport deprived areas due to the difficulty in achieving this score.

Policy	Recommendations
CT 1 – Improving Alternatives to Car Use	 Where an area has a PTAL rating lower than 4 but has been prioritised in terms of development needs, consider how the rating could be increased before relocating development to another area.
CT 2 – New and Enhanced Rail Infrastructure	 Maximise development on PDL – cross-reference to appropriate policies.

An Engaging Public Realm

- 5.6.19 The strategic objective for An Engaging Public Realm is to "endow a strong local sense of place by maintaining and extending our excellent public realm to all parts of the Borough".
- 5.6.20 Overall, these policies perform well against the SA objectives. In terms of positive environmental benefits, the Parks, Gardens, Open Spaces and Waterways and Trees and Landscape policies perform well, particularly against the environmental SA objectives which focus on providing protection, enhancement and creation of the natural environment.
- 5.6.21 The majority of the policies perform well with regards to the SA objective to reinforce local distinctiveness and enhance cultural heritage which marries well with the fundamental vision of 'An Engaging Public Realm'. In particular, the Street Network and Three-Dimensional Street Form policies show significant benefits.
- 5.6.22 The policies also perform well in terms of the social SA objectives. In particular, the SA objective to reduce crime (specifically, the Street Network policy, which highlights designs to minimise opportunities for crime) and the equalities SA objective. This is a result of the nature of the policies which focus on delivering a high quality public realm to include improved accessibility and connectivity and preservation of and greater public access to natural settings such as parks and waterways. Although the Street and Outdoor Life policy aims to 'maintain the free, safe and secure passage of pedestrians' there is scope to place onus on the need to not only maintain but also to 'improve' on the status quo.
- 5.6.23 The Street and Outdoor Life policy performs well against the social equalities SA objective and the economic SA objective without any evident adverse environmental impacts (at the level of this analysis).
- 5.6.24 There is only one case where the outcome of an 'An Engaging Public Realm' policy could potentially have an uncertain impact. This refers to the Three-Dimensional Street Form policy's impact on the housing SA objective. The policy's focus on "draw[ing] from the traditional qualities

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and form of our existing high quality street" could potentially conflict with meeting the high housing need in the Borough.

Policy	R	ecommendation
CR 1 - Street Network	•	N/A.
CR 2 - Three-Dimensional Street Form		
CR 3 - Street and Outdoor Life	•	Suggest amending (a. i.) to 'maintain "and improve" the free, safe and secure passage of pedestrians;
CR 4 - Streetscape	•	N/A.
CR 5 - Parks. Gardens, Open Spaces and Waterways		
CR 6 - Trees and Landscape	-	
CR 7 - Servicing		

Renewing the Legacy

- 5.6.25 The strategic objective for Renewing the Legacy is to "is not simply to ensure no diminution in the excellence we have inherited, but to pass to the next generation a Borough that is better than today, of the highest quality and inclusive for all, by taking great care to maintain, conserve and enhance the glorious built heritage we have inherited and to ensure that where new development takes place it enhances the Borough".
- 5.6.26 The Royal Borough of Kensington and Chelsea benefits from a variety of attractive buildings, parks and gardens. The Borough enjoys numerous listed buildings, areas of historic interest and protected areas that combined provide the unique and valuable character of the Borough.
- 5.6.27 Overall, the 'Renewing the Legacy' policies Context and Character and New Buildings, Extensions and Modifications to Existing Buildings perform well against the SA objectives. A focus on requiring new buildings, extensions and modifications to be 'of the highest architectural and urban design quality' and sensitive to the existing local context should help contribute to meeting the aims of 'Renewing the Legacy'.
- 5.6.28 The nature of existing buildings may not be conducive to improvements in their environmental performance and the stringent requirements of the Historical Assets policy casts doubt over the potential environmental improvements of these developments. In other words will the need to maintain the character and appearance of existing buildings restrict the opportunities for the installation of greater energy efficiency measures in such properties?. Furthermore, the Smallscale Alterations and Additions policy's "bundling" of micro-generation with other electrical and mechanical equipment is likely to hinder the policy's potential positive impact on the SA objective to minimise the Borough's impact on climate change. Although some micro-generation may be considered by some to be visually intrusive, suitable technologies such as passive solar and solar PV can be sympathetically incorporated into existing structures with minimal visual intrusion. By promoting and encouraging appropriate micro-generation technologies these 'additions' could and should be commended in the Borough's approach to tackling climate change.
- 5.6.29 The New Buildings, Extensions and Modifications to Existing Buildings and Smallscale Alterations and Additions policies also set stringent conditions for development which may limit

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the extent to which the housing SA objective can be met. This issue needs to be closely monitored to ensure no worsening of the performance of the housing indicators identified to have worsened since 2005 and documented in the SA Update Report.

- 5.6.30 The Amenity policy is likely to have a positive effect on the energy efficiency and housing SA objectives, however, there is some uncertainty as to this policy's impact on the community facilities SA objective to protect 'uses and facilities which serve a local need'. The policy is limited in its protection of existing amenity spaces and implies that development could be allowed if it can demonstrate that adjoining amenity is 'not significantly reduced', 'that there is no harmful increase in the sense of enclosure' and that there would be 'no significant impact'. As such this policy is potentially open to wider interpretation than other Core Strategy policies which, in general, have a greater focus on ensuring a positive outcome by 'preserving and enhancing', for example, rather than a focus on the mitigation of a likely negative outcome.
- 5.6.31 Unsurprisingly, all the policies perform well against the cultural heritage SA objective to reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage.
- 5.6.32 The policies were not identified to have a clear impact on the economic SA objective.

Policy	Recommendations
CL 1 - Context and Character	• N/A.
CL 2 - New Buildings, Extensions and Modifications to Existing Buildings	
CL 3 - Historic Environment	
CL 4 - Historic Assets	
CL 5 - Amenity	 Consider changing (a) "significantly reduced" to "adversely impacted". Consider re-wording (b) to reduce ambiguity. Consider deleting "harmful" from (c). Consider changing "significant" to "adverse". Make specific reference to Policy CE 1 – Climate Change.
CL 6 - Small-scale Alterations and Additions	 Suggest addressing "micro-generation" separately in the policy to "telecommunications, plant and other mechanical equipment". Suggest new part (c) specific to micro-generation. Suggest re-wording to "micro-generation to be sited so as to maximise its efficiency without significantly impairing visual amenity".

Diversity of Housing

- 5.6.33 The strategic objective for Diversity of Housing is to "have a diversity of housing is [sic] that at a local level, it will cater for a variety of housing needs, and is built for adaptability and to a high quality".
- 5.6.34 The impact of the policies on the environmentally focused SA objectives were, in the most part neutral, however, the appraisal did identify a number of cases where it was not possible to clearly ascertain the impact of the policies on the environmental SA objectives due to lack of detail. Of note, the Housing Targets policy sets ambitious targets for housing delivery, however at this level

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of analysis, it is difficult to identify whether the policy could be successfully delivered without impacting on biodiversity, climate change or the Borough's parks and open spaces given the high land development pressure within the Borough. The impact of the Housing Diversity and Estate Renewal policies on the energy efficiency SA objective was also uncertain due to the limited information on whether energy efficiency measures, building re-use and material recycling would be prioritised. This element, however, should be addressed by the Climate Change policy (CE 1).

- 5.6.35 The policies within 'Diversity of Housing', as expected, performed well against the socially focussed SA objectives. In terms of the housing SA objective (some baseline indicators have shown to have worsened as highlighted in the SA Update Report) the policies should perform well, in particular the Estate Renewal policy. This was due to high pressure on housing affordability within the Borough.
- 5.6.36 The policies also perform well against the equalities SA objective to 'encourage social inclusion (including access), equity, the promotion of equality and a respect for diversity' by clearly setting out the criteria for housing mix, specifying requirements for fully wheelchair accessible homes and stipulations for affordable housing to be provided based on a proposal's floor area rather than the number of proposed residential units. The latter point should ensure that developers who may have tried to avoid providing affordable housing through proposing fewer units (in the case where a unit threshold was specified) have fewer opportunities to avoid these requirements.
- 5.6.37 Only the Protection of Residential Uses policy was identified to have an impact on the economic SA objective to support a diverse and vibrant local economy.

Policy	Recommendation
CH 1 - Housing Targets	• N/A.
CH 2 - Housing Diversity	
CH 3 - Protection of Residential Uses	
CH 4 - Estate Renewal	

Respecting Environmental Limits

- 5.6.38 The strategic objective for Respecting Environmental Limits aims "to contribute to the mitigation of, and adaption to, climate change; significantly reduce carbon dioxide emissions; maintain low and further reduce car use; carefully manage flood risk and waste; protect and attract biodiversity; improve air quality; and reduce and control noise within the Borough".
- 5.6.39 Given that the focus of the policies is to respect environmental limits, it was expected that these policies would perform better against the environmentally focussed SA objectives. In general the policies do perform well, however, the appraisal did raise some uncertainties highlighting the potential for negative impacts on the SA objectives if not carefully detailed and/or implemented. The policies perform particularly well against the biodiversity and climate change SA objectives. Given that the evidence base indicator for biodiversity has worsened since the 2005 Scoping Report, this group of policies has potential to improve performance in this area.
- 5.6.40 The Biodiversity policy not only performed well against the biodiversity, climate change and parks and open space environmental SA objectives, but the policy has also shown a positive social impact, reflected against the community facilities SA objective. The Air Quality policy similarly

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has a positive impact on the community facilities SA objective, by resisting developments that have "an unacceptable impact on amenity" and generally through enhancing and protecting community uses by improving air quality. The Noise and Vibration policy also controls impact that affects social amenity. By protecting and enhancing environmental factors (biodiversity, air quality, noise), there are also social benefits in terms of health and community well-being, although this cannot be reflected against the health SA objective which is provision / access focussed.

- 5.6.41 The Flooding policy also works towards safeguarding the Borough's Conservation Areas, listed buildings and Parks and Gardens, thus having a positive impact on the parks and open spaces and cultural heritage SA objectives. Whether this will translate in to a positive impact on the biodiversity SA objective is unclear.
- 5.6.42 The appraisal identified that the benefits to the environment are unlikely to constrain the social or economic SA objectives. There is a greater level of detail for the flooding policy with regards to the potential for positive impacts on the community facilities SA objective (by protecting amenity), however its impact on housing would be more dependent upon interpretation and implementation of the policy. Similarly, the Climate Change policy has an unclear impact on the housing objective by imposing tight targets for emissions, which can push housing prices up, but can also result in higher quality housing and energy savings etc. The overall impact of this group of policies for 'Respecting Environmental Limits' is either negligible or unclear on the housing SA objective.
- 5.6.43 The policies were not identified to have a clear impact on the Economic SA objective. Theoretically, however, safeguarding against flooding can act to protect businesses from risk and large financial losses associated with flooded premises.
- 5.6.44 The Climate Change policy has no particular impact on the waste SA objective, although a positive impact could occur if Energy from Waste is considered and the recycling of construction and building waste (although in part these are covered by Building Research Establishment Environmental Assessment Method (BREEAM) and Code for Sustainable Homes (CfSH)).
- 5.6.45 Depending on implementation, the Waste policy could have positive or negative impacts on the SA objectives for air quality, in terms of how waste is treated (e.g. if it is incinerated) and energy efficiency, depending on how much use is made of energy from waste and whether these opportunities are identified and pursued.
- 5.6.46 Although the Air Quality policy resists biomass on the basis that it can contribute to increased NO_x, it was considered that this policy overall is likely to have a positive impact on the climate change SA objective, given that it places a requirement for developers to demonstrate that the credits available (from CfSH and BREEAM assessments) for reducing pollution and emissions are obtained.
- 5.6.47 This group of policies is not expected to have an impact on the crime SA objective.

Policy	Recommendations
CE 1 – Climate Change	• N/A.
CE 2 – Flooding	
CE 3 - Waste	Consider the potential for Energy from Waste.

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Policy	Recommendations
CE 4 - Biodiversity	• N/A.
CE 5 – Air Quality	
CE 6 – Noise and Vibration	

Results of the Development Management Policies appraisal

- 5.6.48 The Development Management Policies, grouped under their corresponding strategic objectives, will be used to determine planning applications and steer development. The Sustainability Appraisal has shown that the majority of these policies are likely to result in positive sustainable development for the Borough.
- 5.6.49 Polices grouped under Keeping Life Local, Better Travel choices, An Engaging Public Realm, Renewing the Legacy and Respecting Environmental Limits are identified to perform particularly well against the environmentally focussed SA objectives. This is because these policies focus on capitalising on what makes the Borough one of the most desirable places to live, work and visit, including attractive and safe walkable neighbourhoods, good access to local services and protection of public open space with a focus on protecting and enhancing biodiversity.
- 5.6.50 The Fostering Vitality and A Diversity of Housing policies tailored more towards provision of social and community facilities, housing and facilitating inclusion and equity among residents perform particularly strongly against the socially focused SA objectives. The scarcity of development land in the Borough has resulted in strong competition between commercial, residential and community and social uses. The policies' appreciation and balanced approach to these competing issues should enable development to proceed and housing delivery to be addressed without undue impact on social and community infrastructure.
- 5.6.51 The Infrastructure Delivery and Planning Obligations policy and in particular, Keeping Life Local and Fostering Vitality policies were identified to positively impact the economic SA objective to support and foster a diverse and vibrant local economy. The Borough benefits from numerous 'local' centres and its attractive natural and built environment contribute to maintaining their important individual identities and characters. The policies' support of appropriate commercial and community services provision at the local level, whilst maintaining a focus on larger development in more central locations, aligns with both the Borough's current and future vision to provide development and services at an appropriate scale and location to ensure ease of access for all borough residents.
- 5.6.52 Although, no policies were identified to result in a clear negative impact on any of the SA objectives, a number of uncertainties were highlighted by the appraisal, specifically, with regards to the Infrastructure Delivery and Planning Obligations and Hotels policies. The main reason for the uncertainty is the need for detail at a site development level or the limited information contained within the policies in order to undertake an informed appraisal. However, the implementation of these policies, as all development focussed policies, will draw on the criteria set out in more prescriptive development supporting policies. As such, it is likely that the outcome of many of the policies currently identified with an 'uncertain' impact could be positive.

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6 Conclusions and Monitoring

6.1 Introduction

- 6.1.1 This chapter aims to bring together the main findings of the SA. Firstly, **Table 18** sets out a consideration of cumulative effects in terms of Places, Strategic Sites and Development Management Policies against each of the SA objectives. Following this, **Table 19** makes recommendations with regard to monitoring such effects. Finally, there is a short conclusion on the outcomes of the SA process.
- 6.1.2 Monitoring significant effects is a key requirement of the SEA Directive:

The SEA Directive states that 'member States shall monitor the significant environmental effects of the implementation of plans and programmes'.

Article 10, the SEA Directive

'Monitoring allows the actual significant effects of implementation of the SPD to be tested against those predicted in the SA'.

Section 4.3.21, Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, DCLG, 2005

Cumulative effects

6.1.3 The Strategic Objectives provide the strategic level delivery mechanism for the overarching Core Strategy Vision. Correspondingly, the Places, Strategic Site and Development Management Policies provide the detail to facilitate their effective implementation. From **Tables 15, 16 and 17** it is possible to get an idea of which Sustainability Appraisal objectives might be at risk as a result of a number of policies acting cumulatively to generate a significant negative effect. However, the table cannot tell the whole story, **Table 18** sets out a short discussion on the potential for cumulative effects of the Places, Strategic Sites and Development Management Policies in terms of each SA objective.

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SA Objectives		Cumulative effect
	Biodiversity	The majority of Places and Strategic Sites are likely to have negligible to positive impacts on biodiversity, however the Golborne / Trellick Place is likely to have a significant positive impact. Four Strategic Sites have shown uncertain impacts for biodiversity. These uncertainties relate to the limited detail on biodiversity protection or enhancement elements within these policies.
		The majority of the Development Management Policies are likely to have negligible impact on biodiversity, however, the Parks, Gardens, Open Spaces and Waterways and Biodiversity policies are likely to have significant positive impacts. In general policies grouped under Renewing the Legacy and Respecting Environmental Limits perform well and are likely to deliver a positive outcome. The relationship between this SA objective and some policies under Keeping Life Local, Fostering Vitality, Diversity of Housing, Infrastructure Delivery and Planning Obligations and Respecting Environmental Limits are uncertain. In total six policies were identified as likely to result in an uncertain outcome, which, considering a biodiversity baseline indicator was identified to have worsened, the cumulative impact of these policies, if not carefully implemented could contribute to further decline of the natural environment and biodiversity in the Borough.
Environment		Overall the Places, Strategic Sites and Development Management Policies should result in a positive outcome for the natural environment and biodiversity; however, this will require careful monitoring of those policies identified as having uncertain impacts so as to ensure no further deterioration in performance against the SA objective and the Borough's baseline indicators.
Climate change		The majority of Places and Strategic Sites are likely to have negligible to positive impacts on climate change; however the Kensal Place and Strategic Site, Golborne / Trellick Place and Earl's Court Place and Strategic Site are likely to have significant positive impacts. Three Strategic Sites have shown uncertain impacts for climate change. These uncertainties relate to the limited detail on climate change elements within these policies.
		Overall, the Development Management Policies are likely to have an overall positive impact on this SA objective. Specifically, the policies grouped under Keeping Life Local, Better Travel Choices and Respecting Environmental Limits are likely to have positively strong impacts on the mitigation of climate change. Individual policies such as Walkable Neighbourhoods and Neighbourhood Facilities, Improving Alternatives to Car Use, New and Enhanced Rail Infrastructure, Climate Change and Flooding are all likely to have significant positive impacts. Half of the policies are unlikely to have any impact on this SA objective and only three policies could potentially result in an uncertain outcome. These uncertainties relate to buildings and infrastructure development and arise due to the limited detail on climate change mitigation elements within these policies.

Table 18: Cumulative effects discussion

Flood risk	The majority of Places and Strategic Sites are likely to have negligible impacts on flood risk. Three Places and one Strategic Site have shown uncertain impacts for flood risk. These uncertainties highlight identified flood risk to be considered where potential development is concerned or the exception test as required by PPS25 will need to be applied. Policies grouped under Keeping Life Local, Fostering Vitality, Better Travel Choices, Renewing the Legacy and Diversity of Housing are unlikely to have any impact on flood risk in the Borough. Two policies grouped under each of An Engaging Public Realm and Respecting Environmental Limits are likely to have a positive impact. Although there is some uncertainty over the effect of the Infrastructure Delivery and Planning Obligations policy which is dependent on whether flood risk infrastructure would be required or a planning obligation is sought relating to flood risk. In combination, the Places, Strategic Sites and Development Management Policies should assist with reducing the risk of flooding in the Borough.
Air quality	The majority of Places and Strategic Sites are likely to have positive impacts on air quality. Four Strategic Sites have shown uncertain impacts for air quality. These uncertainties relate to the limited detail on air quality elements within these policies. Approximately one quarter of the Development Management Policies should help improve air quality in the Borough. At this level of analysis, only two policies were identified to have an uncertain outcome on this SA objective with the remainder predicted to have negligible impact. Policies grouped under Keeping Life Local and Better Travel Choices, principally focussing on local amenity accessibility, promotion of sustainable forms of transport and reduced personal car use are likely to have the most positive cumulative impacts on air quality in the Borough. The uncertainty surrounds the effect of Waste and Infrastructure Delivery and Planning Obligations policies. The uncertainties are unlikely to detract from the overall positive cumulative impact of the Places, Strategic Sites and Development Management Policies on air quality.
Parks & open spaces	The Core Strategy should have an overall positive impact on parks and open spaces in the Borough. The Core Strategy clearly identifies the value of parks and open spaces to the success of the Borough and throughout clearly articulates the need to preserve and enhance the existing provision. The majority of Places and Strategic Sites are likely to have positive impacts on parks and open spaces; however the Golborne / Trellick, Earl's Court, Kensington High Street, South Kensington and Lots Road / World's End Places are likely to have significant positive impacts. Two Strategic Sites have shown uncertain impacts for parks and open spaces. These uncertainties relate to the limited detail on parks and open space elements within these policies. Four Development Management Policies are identified to potentially

	result in an uncertain outcome for the SA objective due to their focus on housing, hotel and infrastructure delivery. The extent to which these policies could be administered without impacting on parks and open spaces was unclear.
Pollution	The majority of Places and Strategic Sites are likely to have positive to negligible impacts on pollution. One Place and Three Strategic Sites have shown uncertain impacts for air quality. These uncertainties relate to whether the dust and noise problems that are significant issues in Latimer because of the Hammersmith and City railway line (which is above ground), the Westway flyover, and the West Cross route will improve as they largely are out of the Council's control and identified contamination to be addressed for site development. The majority of the Development Management Policies are likely to have negligible impact on pollution in the Borough. Eight policies grouped under Keeping Life Local, Fostering Vitality, Better Travel Choices, An Engaging Public Realm and Respecting Environmental Limits are likely to deliver positive benefits. Three policies were identified to have an uncertain impact. No policies were identified to have a clearly negative impact. Although there are three policies that could result in an uncertain outcome for the SA objective, namely Infrastructure Deliver and Planning Obligations, Flooding and Waste.
	It is still likely that on balance the overall cumulative impact of the Places, Strategic Site and Development Management Policies would be positive.
Previously developed land	All of the Places (apart from no impact determined for the Spatial Strategy policies) and Strategic Sites are expected to have positive impacts on prioritising development on previously developed land. The Wornington Green, Land adjoining Trellick Tower and North Kensington Sports Centre Strategic Sites are likely to have significant positive impacts. For Places and Strategic Sites policies positive cumulative impacts are expected.
	All the Development Management Policies grouped under Renewing the Legacy, Diversity of Housing and Respecting Environmental Limits are unlikely to have any impact on this SA objective. Of the ten policies identified as likely to affect the SA objective, five were identified as uncertain. In all cases, the uncertainties have arisen due to lack of detail within the specific policies and hence, at this level of appraisal it is not possible to identify whether the cumulative impact of the Development Management Policies would result in a positive or negative outcome for this SA objective.

	Approximately one third of all policies are likely to have a positive or significant positive impact on promoting traffic reduction and encouraging more sustainable alternative forms of transport. Two policies are identified to potentially have uncertain outcomes. No policies were identified to have a negative impact on the SA objective. Overall identified uncertainties are unlikely to detract from the overall positive cumulative impact of the Places, Strategic Sites and Development Management Policies on sustainable transport.
Waste	The majority of Places and Strategic Sites are likely to have negligible to positive impacts on reducing waste. The Kensal Place and Strategic Site are likely to have significant positive impacts. Three Strategic Sites have shown uncertain impacts for waste. These uncertainties relate to the limited detail on waste management elements within these policies. For Places and Strategic Sites policies no negative cumulative impacts are expected. Of the seven Development Management Policies identified likely to affect the SA objective to reduce waste and maximise recycling five were determined to be uncertain and two, namely Climate Change and Waste were identified to result in a positive outcome. The uncertainties arise due to the focus principally on promoting development and introducing retail, both of which would indirectly result in increased waste in their implementation. The extent to which the Climate Change and Waste policies can mitigate these development impacts is uncertain and hence until the specific waste DPD has been developed it is not possible to clearly determine the likely cumulative impacts of the Development Management Policies on this SA objective.
Energy efficiency	The majority of Places and Strategic Sites are likely to have negligible to positive impacts on encouraging energy efficiency. The Earl's Court Place and Strategic Site and Kensal Strategic Site are likely to have significant positive impacts. Two Strategic Sites have shown uncertain impacts for energy efficiency. These uncertainties relate to lack of specification to incorporate energy efficient sustainable design and construction standards. For Places and Strategic Sites policies no negative cumulative impacts are expected. Three Development Management Policies are identified to result in a positive or significant positive impact on encouraging energy efficiency through building design. Nine policies were identified as potentially resulting in an uncertain outcome and the remaining policies were identified to have negligible impact on this objective. Those policies identified as showing uncertain impacts are predominantly associated with the delivery of infrastructure and development; however, given that Policy CE 1 Climate Change (significant positive) should inform the delivery of development it is likely that the cumulative impact would be positive.
Cultural heritage	The majority of Places and Strategic Sites are likely to have positive impacts on reinforcing local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural

		heritage. Eight Places and one Strategic Site are likely to have significant positive impacts.
		The impact of the Development Management Policies on cultural heritage in the Borough is likely to be overwhelmingly positive. Although there is one uncertainty as to the impact of the Infrastructure Delivery and Planning Obligations Policy.
		The Core Strategy's explicit recognition of the value of the Borough's cultural heritage in combination with the existing Places, Strategic Sites and Development Management Policies should ensure an overall positive cumulative impact.
Social	Crime	The majority of Places and Strategic Sites are likely to have negligible to positive impacts on reducing crime and anti-social behaviour and the fear of crime. The Westway Place is likely to have significant positive impact. Two Places and two Strategic Sites have shown uncertain impacts for crime. These uncertainties relate to lack of mention of whether an area is considering measures to improve community safety or it is not clear what a development's impacts would be on crime. The majority of identified impacts for the Development Management Policies on the crime SA objective are positive with only one policy (Street Markets) identified as possibly resulting in an uncertain effect. As such, the cumulative impact of the policies, which should help to address the worsening trend identified in the baseline indicator for crime since 2005 should be positive. Overall it is expected that the Places, Strategic Sites and Development Management Policies should not impact negatively on and should help to address crime and anti-social behaviour in the Borough.
	Equalities	The majority of Places and Strategic Sites are likely to have to positive impacts on encouraging social inclusion (including access), equity, the promotion of equality and a respect for diversity. The North Kensington policy is likely to have significant positive impact. For Places and Strategic Sites policies positive cumulative impacts are
		expected. The Development Management Policies are likely to have a cumulative positive effect on equalities in the Borough with over half of the policies expected to result in a positive impact.
	Community facilities	The majority of Places and Strategic Sites are likely to have to positive impacts on ensuring that social and community uses and facilities which serve a local need are enhanced, protected, and to encourage the provision of new community facilities. The North Kensington policy, Latimer and Lots Road / World's End Places and Kensal and North Kensington Sports Centre Strategic Sites are likely to have significant positive impact.
		The Core Strategy should result in a positive impact on this SA objective, in particular the Development Management Policies grouped under Keeping Life Local, Fostering Vitality, Diversity of Housing and Respecting Environmental Limits. Overall, 16 of the policies are expected to result in either positive or significant positive impacts and only two policies which could result in an uncertain outcome. No Places, Strategic Sites or Development Management Policies are

	identified to result in a negative cumulative outcome.
Housing	The majority of Places and Strategic Sites are likely to have to positive impacts on housing. The Quanta of Development and North Kensington policies along with the Kensal and Earl's Court Places and Kensal and Warwick Road Strategic Sites are likely to have significant positive impact. One uncertain impact was identified. For Places and Strategic Sites policies positive cumulative impacts are expected. Of all the Development Management policies identified as likely to have an impact on this SA objective over half were identified as uncertain. However, all policies under Diversity of Housing are predicted to result in a positive or significant positive outcome and therefore cumulatively it is likely that the overall outcome could be positive. Considering the constraints on housing availability and affordability in the Borough and the identified worsening condition of housing baseline indicators the effects of the policies on this SA objective should be closely monitored.
Health	The majority of Places and Strategic Sites are likely to have to positive impacts on healthcare provision. One uncertain impact was identified. For Places and Strategic Sites policies positive cumulative impacts are expected. The Development Management Policies are expected to cumulatively have a positive impact on the provision of accessible healthcare, however, there are a large number of policies expected to have no impact against this objective such as all the policies grouped under Renewing the Legacy. There are a large number of uncertainties identified under Fostering Vitality, reflecting the unclear impacts of policies that focus on provision of retail and business units on healthcare provision. It is important to monitor the impact of this group of policies, to ensure that a focus on retail, business (and hotels, etc.) does not negatively impact upon provision of healthcare. It should also be noted that, although it cannot be accounted for under this SA objective that focuses on healthcare provision, the policies grouped under Respecting Environmental Limits are likely to improve health through improving environmental quality e.g. green infrastructure, and other policies which may improve health by increasing community well-being e.g. through amenities, good quality housing, employment opportunities etc.

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	Economic Growth	The majority of Places and Strategic Sites are likely to have to positive impacts on economic growth in the Borough. Kensal, Portobello / Notting Hill, Kensington High Street, Knightsbridge and King's Road / Sloane Square Places and Wornington Green Strategic Site are likely to have significant positive impact. One uncertain impact was identified.
λu		For Places and Strategic Sites policies positive cumulative impacts are expected.
Economy		Cumulatively, the Development Management Policies should have a positive impact on the SA objective to support a diverse and vibrant local economy to foster sustainable economic growth. In particular, those grouped under Keeping Life Local and Fostering Vitality which promote better transport access and support business needs and retail space needs both in the variety and size of provision.
		The policies grouped under the other Strategic Objectives are unlikely to contribute greatly to the economic growth SA objective, with no policies grouped under Renewing the Legacy identified to have any impact on the economic SA objective.

6.2 Mitigation and Monitoring

6.2.1 **Table 19** summarises the significant effects identified by the Sustainability Appraisal and recommendations alongside suggestions for monitoring. Monitoring suggestions are based on existing indicators already monitored and suggested to monitor the Core Strategy, Annual Monitoring Reports and Government guidance.

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Table 19: Monitoring suggestions

Significant effect	Monitoring suggestions
 Uncertainty exists for the impact of the Core Strategy on biodiversity. This is significant as the Sustainability Appraisal Update Report identified some baseline indicators for biodiversity had worsened. It will be critical to monitor the plan against biodiversity indicators to ensure that further species populations in the Borough do not continue to fall in numbers. 	 Monitor using relevant Biodiversity indicators from Chapter 38 Monitoring in the Core Strategy.
 The Sustainability Appraisal Update Report (2009) identified some baseline indicators for crime had worsened and there are no specific indicators set out in the Core Strategy to monitor this. However, despite uncertainty over the Street Markets policy's impact on crime, several policies were assessed to have a positive effect on the crime SA objective. Policies where a positive impact on the crime SA objective has occurred should be carefully implemented and monitored to maximise their benefit. 	 Monitor using appropriate indicators as prescribed by the National Indicators for Local Authorities and Local Authority Partnerships⁷ and/or specific indicators relevant to monitoring the performance of the Designing Out Crime SPD.
 Uncertainty exists for the impact of the Core Strategy on housing. This is significant as the Sustainability Appraisal Update Report (2009) identified some baseline indicators for housing which had worsened. It will be important to monitor supply and demand for housing and conditions within the housing market in the Borough. 	 Monitor using relevant indicators for A Diversity of Housing, Renewing the Legacy and Respecting Environmental Limits from Chapter 38 Monitoring in the Core Strategy.

⁷ CLG (2009) National Indicators for Local Authorities and Local Authority Partnerships: Updated National Indicator Definitions, Department for Communities and Local Government, available [online] at http://www.communities.gov.uk/documents/localgovernment, available [online] at http://www.communities.gov.uk/documents/localgovernment, available [online] at

Significant effect	Monitoring suggestions
• There is a relatively high degree of uncertainty regarding the effect of the Core Strategy on prioritising development on previously developed land. However, given the Borough's limited land availability, its appreciation of the value of its open space and its performance against government indicators regarding previously developed land this may not necessarily prove to be a significant issue.	 Monitor using relevant indicators as identified in the Annual Monitoring Report.
• There is some uncertainty surrounding how the Core Strategy policies grouped under the Fostering Vitality would impact on parks and open spaces. It would be useful to determine the plan's impact on the provision of parks and open spaces due to their scarcity.	 Monitor using relevant indicators for An Engaging Public Realm from Chapter 38 Monitoring in the Core Strategy.
 There is a need to monitor flood risk closely. It is important to make use of the SFRA and work the Council has undertaken on applying the sequential test to strategic development sites. This approach should also be applied to development expected in the Borough's Places. There may also be some benefit to recording the mitigation measures that have been put in place, so that their effectiveness (in terms of wider sustainability objectives as well as flood risk reduction) can be monitored. 	 Monitor using relevant Flooding indicators from Chapter 38 Monitoring in the Core Strategy. The effectiveness of implemented flood mitigation measures.
 A key effect of the plan will be to stimulate further socio-economic regeneration in North Kensington. 	 Monitor using relevant Strategic Site indicators for Kensal, Wornington Green, Land adjacent to Trellick Tower and North Kensington Sports Centre from Chapter 38 Monitoring in the Core Strategy. Monitor relevant economic, employment and deprivational indicators in North Kensington

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Significant effect	Monitoring suggestions	
	including key locations such as Kensal.	
• The Core Strategy proposes a significant amount of new and revised transport infrastructure and streetscaping. The effectiveness of these proposals in facilitating and encouraging people to use more sustainable forms of transport should be carefully assessed.	 Monitor using relevant indicators for An Engaging Public Realm and Better Travel Choices from Chapter 38 Monitoring in the Core Strategy. 	
• The entire Borough is a designated Air Quality Management Area and, although the Core Strategy generally has a positive impact against the air quality SA objective for air quality, there were some uncertainties identified. Aspire to maximise positive impacts on the SA air quality objective.	 Monitor using relevant indicators for Respecting Environmental Limits from Chapter 38 Monitoring in the Core Strategy. 	
• There is a need to monitor provision of healthcare and to ensure that retail and business uses are not prioritised over access to essential community services.	 Monitor using relevant indicators for Keeping Life Local, Better Travel Choices and Fostering Vitality from Chapter 38 Monitoring in the Core Strategy. 	

6.3 Conclusions

- 6.3.1 The Core Strategy has set out an ambitious approach to growth and development. It presents a suite of development management policies and identifies a number of key places and strategic sites earmarked for change and/or protection with the aim to create a legacy for the future. The Core Strategy proposes a higher level of housing growth from 2011/12 which should enable the Borough to capitalise on future economic opportunities and help work towards tackling existing issues such as the Borough's polarised economy and areas of high socio-economic deprivation. The Core Strategy's specific focus on North Kensington should help address such issues and bring about significant regeneration opportunities to an area beset by poor public transport accessibility, physical barriers to movement, high unemployment and other deprivation issues.
- 6.3.2 Overall, the Core Strategy presents balanced plans for development for its identified places and strategic sites, however, the success of these are likely to be, in part, dependent upon future transport plans within the Borough and the associated dependency of some strategic growth sites, including Kensal.
- 6.3.3 The Core Strategy has taken account of environmental constraints, such as the lack of land for development and scarcity of public open space. It has achieved this by focussing on the

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redevelopment of existing land that requires regeneration and/or redevelopment in order to meet or exceed current standards. Furthermore, the Core Strategy should ensure effective environmental protection, and in some cases enhancement. The strategic sites and development management polices include a range of appropriate guidance or criteria to guide development; and in general, it is thought that the non-spatial 'thematic' polices in the Core Strategy relating to the environment should also be effective. In terms of climate change it is noted that the Core Strategy requires relatively stringent sustainable design and construction requirements. This policy in particular would benefit from being reflected in other Core Strategy policies for retail, housing, business etc. and also in the Strategic Sites and Places polices to clearly demonstrate requirements for development in mitigating and adapting to climate change. The principle of greater cross referencing of policies could be applied more widely within the Core Strategy. The identified positive environmental impacts – particularly through the Strategic Objectives Better Travel Choices and Respecting Environmental Limits, should assist with addressing the Borough's designation as an Air Quality Management Area.

- 6.3.4 A key issue for the Borough is housing affordability and availability and, in response to this, the Core Strategy is consistent with the current requirements of the London Plan (350 units per annum) and proposes to increase this figure to 600 units a year from 2011/2012 which slightly exceeds the revised London Plan figure⁸. The increase in housing delivery is to be accommodated, to a large extent, by the opportunities for regeneration in Kensal and Earl's Court. In terms of affordable housing, the Borough is planning for 200 units per annum from when the new London Plan is adopted. These proposals are ambitious in scale and should help working towards meeting the high housing need in the Borough.
- 6.3.5 A further key aim of the Core Strategy is to maintain and promote the Borough as a business and retail centre, hence enabling economic growth, without adversely impacting the Borough's world renowned cultural heritage. In light of this however, the SA highlighted the need to ensure that the other social and community facilities such as healthcare services are not negatively impacted by a focus on business and retail. The Core Strategy should avoid such impacts through ensuring policies safeguard social and community uses and the Strategic Sites and Places cater for the local social and community needs of the Borough's residents, in addition to the Borough's business and retail needs.
- 6.3.6 In summary, the Core Strategy is a commendable response to meeting the Borough's existing and potential future challenges. Its combination of development management policies and vision for its places and delivery of strategic sites should ensure a balanced and progressive approach to development and help to deliver the ambitions of the Core Strategy as a whole. The Sustainability Appraisal has found that cumulatively the policies in the Core Strategy should lead to positive sustainable development outcomes.

⁸ The London Plan Spatial Development Strategy for Greater London – Consultation draft replacement plan (October 2009) proposes an annual average housing provision target of 585 between 2011 and 2021.

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7 Next Steps

7.1 Consultation

- 7.1.1 To enable the community and other stakeholders to continue to contribute to the LDF, there is now a period of formal consultation on the **Proposed Submission Core Strategy for the Royal Borough of Kensington and Chelsea with a focus on North Kensington**. This SA Report will be available for consultation alongside the Core Strategy, to facilitate more informed consultation responses.
- 7.1.2 Following the consultation, the consultation responses as well as the findings of the SA will be further taken into account by the Council. The Core Strategy will be drafted in its final form and submitted to Government. There will then be further consultation, before an independent examination by a planning inspector of the submitted document.
- 7.1.3 Should the plan undergo any further significant change in the future, including as a result of taking onboard consultation responses, the significant changes will also be submitted for further SA.

7.2 SEA Statement

7.2.1 Once a plan or programme has been adopted, the SEA Directive requires those responsible for preparing it – in this case the Council - to provide the public and the Consultation Bodies with information on how environmental considerations and consultation responses are reflected in the plan or programme and how its implementation will be monitored in the future. The Directive states that:

Plan or programme proponents should ensure that, when a plan or programme is adopted, the Environmental Consultation Bodies and the public "are informed and the following items are made available to those so informed:

(a) the plan or programme as adopted;

(b) a statement summarising how environmental considerations have been integrated into the plan or programme...[including] the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with, and

(c) the measures decided concerning monitoring [of the plan]

(Annex 9(1))

7.2.2 In light of this requirement, the Council will prepare an SEA / SA Statement setting out the above information (reporting on how sustainability considerations have been taken into account rather than environmental considerations only).

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Appendix 1 – SEA Checklist

Quality assurance is an important element of the appraisal exercise. It helps to ensure that the requirements of the SEA Directive are met, and show how effectively the appraisal has integrated sustainability considerations into the plan-making process.

Gu	idance checklist	Chapter	Carried out by
•	The plan's purpose and objectives are made clear.	3	Scott Wilson
•	Sustainability issues, including international and EC objectives, are considered in developing objectives and targets.	2	Scott Wilson
•	SA objectives are clearly set out and linked to indicators and targets where appropriate.	2	Scott Wilson
•	Links with other related plans, programmes and policies are identified and explained.	2	Scott Wilson
•	Conflicts that exist between SA objectives, between SA and plan objectives, and between SA and other plan objectives are identified and described.	2 and 5	Scott Wilson
•	The environmental consultation bodies are consulted in appropriate ways and at appropriate times on the content and scope of the SA Report.	Scoping Report and SA Update Report	Royal Borough of Kensington and Chelsea
•	The appraisal focuses on significant issues.	Scoping Report, SA Update Report and 2	Scott Wilson
•	Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit.	Scoping Report, SA Update Report and 4	Scott Wilson
•	Reasons are given for eliminating issues from further consideration.	Scoping Report and SA Update Report	Scott Wilson
•	Realistic alternatives are considered for key issues, and the reasons for choosing them are documented.	Plan Documents and 3 and 5	Scott Wilson
•	Alternatives include 'do nothing' and/or 'business as usual' scenarios wherever relevant	2	Scott Wilson
•	The sustainability effects (both adverse and beneficial) of each alternative are identified and compared	5 and 6	Scott Wilson

Gu	idance checklist	Chapter	Carried out by
•	Inconsistencies between the alternatives and other relevant plans, programmes or policies are identified and explained.	5 and 6	Scott Wilson
•	Reasons are given for selection or elimination of alternatives.	Plan Documents and 3 and 5	Scott Wilson
•	Relevant aspects of the current state of the environment and their likely evolution without the plan are described.	2	Scott Wilson
•	Characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan where practicable.	2	Scott Wilson
•	Difficulties such as deficiencies in information or methods are explained.	Scoping Report and SA Update Report	Scott Wilson
•	Likely significant social, environmental and economic effects are identified, including those listed in the SEA Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape), as relevant.	5 and 6	Scott Wilson
•	Both positive and negative effects are considered, and where practicable, the duration of effects (short, medium or long-term) is addressed.	5 and 6	Scott Wilson
•	Likely secondary, cumulative and synergistic effects are identified where practicable.	5 and 6	Scott Wilson
•	Inter-relationships between effects are considered where practicable.	5 and 6	Scott Wilson
•	Where relevant, the prediction and evaluation of effects makes use of accepted standards, regulations, and thresholds.	5 and 6	Scott Wilson
•	Methods used to evaluate the effects are described.	4	Scott Wilson
•	Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan are indicated.	5 and 6	Scott Wilson
•	Issues to be taken into account in development consents are identified.	N/A	
•	Is clear and concise in its layout and presentation.	All	Scott Wilson
•	Uses simple, clear language and avoids or explains technical terms.	Non Technical Summary	Scott Wilson

Gu	idance checklist	Chapter	Carried out by
•	Uses maps and other illustrations where appropriate.	All	Scott Wilson
•	Explains the methodology used.	All	Scott Wilson
•	Explains who was consulted and what methods of consultation were used.	Scoping Report and 7	Scott Wilson
•	Identifies sources of information, including expert judgement and matters of opinion.	Scoping Report and 2	Scott Wilson
•	Contains a non-technical summary.	Yes	Scott Wilson
Co	nsultation		
•	The SA is consulted on as an integral part of the plan- making process.	Yes, see 1 and 7	Scott Wilson
•	The consultation bodies, other consultees and the public are consulted in ways which give them an early and effective opportunity within appropriate time frames to express their opinions on the draft plan and SA Report.	Yes	Royal Borough of Kensington and Chelsea
•	The SA Report and the opinions of those consulted are taken into account in finalising and adopting the plan.	Forthcoming	
•	An explanation is given of how they have been taken into account.	Forthcoming	
•	Reasons are given for choices in the adopted plan, in the light of other reasonable options considered.	Forthcoming	
•	Measures proposed for monitoring are clear, practicable and linked to the indicators and objectives used in the SA.	Section 6	Scott Wilson
•	Monitoring is used, where appropriate, during implementation of the plan to make good deficiencies in baseline information in the SA.	Forthcoming	
•	Monitoring enables unforeseen adverse effects to be identified at an early stage (These effects may include predictions which prove to be incorrect.)	Forthcoming	
•	Proposals are made for action in response to significant adverse effects.	Forthcoming	

Appendix 2 – GIS Constraint Layers

GIS Tiers
1st Tier
Buildings in flood risk zone
Grade I, II and II* listed buildings
Scheduled Ancient Monuments
Sites of Nature Conservation Importance
Strategic view of St Paul's
2nd Tier
Environmental Constraints
Annual mean NOx
Annual mean PM10
Archaeological priority areas
Conservation areas
Green corridors
Noise incidences
Open space deficiency
Sites of archaeological importance
Tree preservation orders
Social Constraints
Indices of Deprivation - barriers to housing and services (to be filtered using only bottom 10% category)
Indices of Deprivation - crime (to be filtered using only bottom 10% category)
Indices of Deprivation -education, skills and training (to be filtered using only bottom 10% category)
Indices of Deprivation -health deprivation and disability (to be filtered using only bottom 10% category)
Indices of Multiple Deprivation (to be filtered using only bottom 10% category)
Locations of NHS doctors and nurses
Public Transport Accessibility Levels
Economic Constraints
Average income (filter using top 2 and bottom 2 classes only)
Indices of Deprivation - employment (to be filtered using only bottom 10% category)

Indices of Deprivation - income (to be filtered using only bottom 10% category)

Appendix 3 – Strategic Sites Appraisal

Strategic Site: Kensal Gasworks	(sites north and south of the railway)
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	SA Objective	Score	Comment	Recommendations
	1. To conserve and enhance the natural environment and biodiversity	+	The potential for the sites to deliver a 'high-density development which meet a high standard of	urd of sure a positive
	5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables and adopt measures to adapt to climate change	++	environmental sustainability' should ensure a positive outcome particularly for the climate change, waste and energy efficiency SA objectives. In response to the site's expectation to deliver an environmentally responsive medium rise high density	
	6. Reduce the risk of flooding to current and future residents	0		
	7. Improve air quality in the Royal Borough		development of upwards of 2,500 dwellings in close	
	8. Protect and enhance the Royal Borough's parks and open spaces	+	proximity to good public transport - this should ensure a significantly positive outcome for minimising the effects on climate change. The potential to provide on-site	
	9. Reduce pollution of air, water and land	+	waste management facilities, including a recycling	
ŗ	9a. Prioritise development on previously developed land	+	sorting facility and/or anaerobic digestion, should	
Environment	10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic	+	enable a significantly positive outcome for the waste SA objective. The outcome for the energy efficiency SA objective is also likely to be significantly positive with the reuse of the on-site Sainsbury's, implementation of good building design and a 'must' for a high environmental standard of development	
	11. Reduce the amount of waste produced and maximise the amount of waste that is recycled	++		
	14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials	++	(including construction, building materials, waste management, and energy usage/retention) and the provision of a Combined Cooling, Heating and Power	
	16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage	0	(CCHP) or similar with potential to join a wider network in the future.	
			The focus on improved public realm around the canal side should ensure that the proposal performs well against the parks and open spaces SA objectives, with planning obligations for landscaping and amenity improvements to the Grand Union Canal. There are likely to be positive impacts on biodiversity through	

SA Objective	Score	Comment	Recommendations
		carefully managing development in terms of existing biodiversity and encouraging biodiversity creation. It has been noted that Borough Grade I and II Sites of Nature Conservation Importance and green corridors exist on site, notably along the railway and the canal and therefore development should be carefully managed. The allocation also mentions that ways to create biodiversity should also be considered.	
		The decommissioning of the gas holders and land decontamination should improve the environmental quality of the area, when undertaken, and hence enable a positive outcome for the SA objective on pollution.	
		Although the site does not contain any areas of flood risk zone 2 or 3, it was identified to have a risk of surface water flooding in the sequential test and this will require mitigation. The allocation mentions that the site has subsequently passed the sequential test as required by PPS25.	
		The site is poorly connected to existing public transport infrastructure, particularly at the western end of the site and the successful delivery of 2,500 or more new dwellings is dependent on the provision of a Crossrail station. A Crossrail station, improvements to bus services or other improved public transport providing realistic alternative sustainable transport choices should help achieve positive outcomes for the air quality and transport SA objectives. Improved accessibility northwards to Kensal Green and south	
		across the mainline railway would also contribute positively to these SA Objectives.	

	SA Objective	Score	Comment	Recommendations
	2. Reduce crime and anti-social behaviour and the fear of crime	+	The site surroundings contain high levels of employment, income and housing deprivation and this	N/A
	4. Encourage social inclusion (including access), equity, the promotion of equality and a respect for diversity	+	is reflected in the understanding that the availability of the Kensal Gasworks site holds the key to significant	
	12. Ensure that social and community uses and facilities which serve a local need are enhanced, protected, and to encourage the provision of new community facilities	++	regeneration in North Kensington. The provision of social and community uses at the site and improvement to the quality of the public realm, as well as the	
	13. To aim that the housing needs of the Royal Borough's residents are met	++	identified infrastructure and planning obligations requirement for affordable housing contribution should help deliver a significant positive response to the Social	
	15. Ensure the provision of accessible health care for all Borough residents	+	SA objectives, particularly the social and community uses and housing.	
Community			An improved public realm, with increased permeability both north and south of the site combined with likely increased footfall including additional social and community uses (police) should help achieve a positive outcome for the SA objective that aims to reduce crime and the fear of crime.	
			Provision of improved accommodation in addition to social and community facilities (including health, education and police) to meet local needs with the addition of over 2,500 new dwellings, should have a positive impact on equalities and health SA objectives.	
			An improved public realm, with increased permeability both north and south of the site combined with likely increased footfall should help achieve a positive outcome for SA Objective that aims to reduce crime and the fear of crime. Provision of improved accommodation in addition to	
			social and community facilities to meet local needs with the addition of over 2,500 new dwellings, should have a	

	SA Objective	Score	Comment	Recommendations
			positive impact on equalities and health SA Objectives; however, the extent of health care provision is unclear.	
Economy	3. To support a diverse and vibrant local economy to foster sustainable economic growth	+	Any provision of additional retail and business space (including 10,000m2 of offices) would help improve the diversity and vibrancy of the local economy. This would be further enhanced by the provision of improved transport infrastructure enabling greater accessibility to the site. However, the attraction of leisure, education and business uses to the site cannot be guaranteed and will depend upon the planned improved connections to the railway, canal and public realm.	N/A

Key	Likely effect on the SA Objective				
++	Significant positive benefit				
+	Some positive benefit				
0	No significant effect				
Х	Some adverse impact				
XX Significant adverse impact					
?	Uncertain or insufficient information on which to determine				

Strategic Site: Wornington Green

	SA Objective	Score	Comment	Recommendations
	1. To conserve and enhance the natural environment and biodiversity	+	Overall, the proposed redevelopment at Wornington Green should deliver positive environmental improvements to the	
	5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables and adopt measures to adapt to climate change	+		
	6. Reduce the risk of flooding to current and future residents	0		
	7. Improve air quality in the Royal Borough	0		
	8. Protect and enhance the Royal Borough's parks and open spaces	+		
ŧ	9. Reduce pollution of air, water and land	0		
Environment	9a. Prioritise development on previously developed land	++		
Envir	10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic	+		
	11. Reduce the amount of waste produced and maximise the amount of waste that is recycled	0		
	14. Encourage energy efficiency through building design; maximise the re-use of buildings and the recycling of building materials	+		
	16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage	0		

	SA Objective	Score	Comment	Recommendations
			from development, including improvements to the bus infrastructure. The latter infrastructure and planning obligation is likely to have a positive outcome on the transport SA objective.	
	2. Reduce crime and anti-social behaviour and the fear of crime	+	This site and its surroundings are within the top 10% of employment, income, housing and crime deprivation and	N/A
	 Encourage social inclusion (including access), equity, the promotion of equality and a respect for diversity 	+	multiple deprivation nationally. Hence, the proposed redevelopment - with provision of leisure and community facilities and education facilities - could help address these	
Social	 12. Ensure that social and community uses and facilities which serve a local need are enhanced, protected, and to encourage the provision of new community facilities 13. To aim that the housing needs of the Royal Borough's residents are met 15. Ensure the provision of accessible health care for all Borough residents 	+ + +	The specific redevelopment priority to keep the community together, in addition to the identified infrastructure and planning obligations and proposals for improved social and community infrastructure, should help facilitate greater social inclusion and community cohesion and result in positive outcomes for the equalities and social and community facilities SA objectives. Provision of open space for the construction period should sustain community needs in the interim and minimise disruption. Improvements in the building fabric to Decent Homes Standards and additional housing provision (both private and affordable) should assist the Royal Borough in meeting its housing need and the needs of residents and result in a positive outcome for the housing SA objective.	

	SA Objective	Score	Comment	Recommendations
Economy	3. To support a diverse and vibrant local economy to foster sustainable economic growth	++	The proposed leisure and community facilities and the identified construction training contribution should provide some stimulus to the local economy and result in a positive response towards supporting the local economy and fostering economic growth. This positive effect should be further enhanced by provision of 2,000m2 A1 to A5 uses; extending the retail offer and improving the street frontage and connectivity.	N/A

Key	Likely effect on the SA Objective					
++	Significant positive benefit					
+	Some positive benefit					
0	0 No significant effect					
Х	Some adverse impact					
XX	Significant adverse impact					
? Uncertain or insufficient information on which to determine						

Strategic Site: Land adjacent to Trellick Tower

	SA Objective	Score	Comment	Recommendations
	1. To conserve and enhance the natural environment and biodiversity	?	The development of this site contains little information to appraise its impact on many of	 Recommendations to Allocation supporting policy text: Identified constraint adjoining the site (site of local importance for
	5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables and adopt measures to adapt to climate change	?	the environmental SA objectives. However, there should be a strongly positive impact on the SA objective to conserve and enhance cultural heritage, through the restoration and	
	6. Reduce the risk of flooding to current and future residents	0	enhancement and of Trellick Tower – a Grade II* listed building. This includes	nature conservation) should be considered in
	7. Improve air quality in the Royal Borough	?	development of the surrounding land and thus the local environmental quality and	any design of the new development.
	8. Protect and enhance the Royal Borough's parks and open spaces	0	 distinctiveness should also benefit significantly. A significant positive outcome may also be anticipated for the prioritising development on previously developed land SA objective and positive outcome for the SA objective to encourage energy efficiency. There are no identified environmental constraints on the site, although the there are Grade II* listed buildings adjoining the north and west sides of the site and a site of local importance for nature conservation adjoining the north of the site. The site has low flood risk. 	development.
Ŧ	9. Reduce pollution of air, water and land	?		
Environment	9a. Prioritise development on previously developed land	++		
Enviro	10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic	?		
	11. Reduce the amount of waste produced and maximise the amount of waste that is recycled	?		
	14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials	+		
	16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage	++		

	 Reduce crime and anti-social behaviour and the fear of crime Encourage social inclusion (including access), equity, the promotion of equality and a respect for diversity 	+ ?	The delivery of a minimum of 60 residential units to fund regeneration including improvements to social and community facilities (including a new health facility) is likely to bring positive outcomes for the	N/A.
al	12. Ensure that social and community uses and facilities which serve a local need are enhanced, protected, and to encourage the provision of new community facilities	+	crime, equalities, social and community facilities, housing and health SA objectives. In particular, a positive impact would be more certain if the potential for additional	
Social	 To aim that the housing needs of the Royal Borough's residents are met 	+	dwellings, leisure facilities and social and community uses (new health facility) is	
	15. Ensure the provision of accessible health care for all Borough residents	+	achieved. The establishment of a trust fund should assist in supporting social needs. The development site is within the top 10% in terms of crime, housing, income deprivation and multiple deprivation and, therefore, positive redevelopment at the site should deliver beneficial improvements to the local community.	
Economy	3. To support a diverse and vibrant local economy to foster sustainable economic growth	+	The proposal to accommodate studio workspace units, as identified in the allocation section, would be likely to help increase economic growth in the immediate area. The extent to which it diversifies the local economy would be dependent upon the nature of business take-up.	N/A.

Кеу	Likely effect on the SA Objective				
++	Significant positive benefit				
+	Some positive benefit				
0	No significant effect				
Х	Some adverse impact				
XX	Significant adverse impact				
? Uncertain or insufficient information on which to determin					

Strategic Site: North Kensington Sports Centre

	SA Objective	Score	Comment	Recommendations
	1. To conserve and enhance the natural environment and biodiversity	?	The proposed allocation of development on the site contains few references to environmental constraints. The proposed	supporting policy text:
Environment	5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables and adopt measures to adapt to climate change	?	developed land; however, the extent of development on the existing open space is unclear. However, there is allocation for open space in the form of external sports facilities, which should be	Mention that remodelling and/or new development will incorporate the principles of sustainable design and
	Reduce the risk of flooding to current and future residents	0	shared with the sports centre. The potential that land contamination exists on site should be addressed as part of any development. No details are provided on the management of the	 construction. Assess level of land contamination, if any, and how
	7. Improve air quality in the Royal Borough	?	Grade II listed building to the north of the site.	this could be addressed through
	8. Protect and enhance the Royal Borough's parks and open spaces	?	The site has relatively poor transport accessibility, particularly with regards to the existing road network. An improved street network and better permeability would be required if a new secondary school were to be provided on the site, however; depending on the delivery of the identified infrastructure and planning obligations towards improving public transport infrastructure, there could be a trend towards greater personal car use in the area. The site is at high risk of surface water and sewerage flooding as determined by the sequential test, but is likely to be acceptable, provided approved mitigation techniques are proposed for surface and sewer water flooding. The allocation mentions that the site has passed the sequential test as required by PPS25. It is not clear as to the likely sustainability credentials of the proposed new infrastructure. A positive outcome for the climate change and energy efficiency SA objectives should result from, incorporation of CCHP or similar; and the design of the new or remodelled public sports centre should incorporate energy efficient design standards and construction – although this is not specified.	the allocation.
	9. Reduce pollution of air, water and land	?		
	9a. Prioritise development on previously developed land	++		
	10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic	?		
	 Reduce the amount of waste produced and maximise the amount of waste that is recycled 	0		
	14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials	?		
	16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage	0		

	SA Objective	Score	Comment	Recommendations
	Reduce crime and anti-social behaviour and the fear of crime	+	The proposed site development has a strong positive social element including a new secondary school with sports facilities and	N/A
Social	 Encourage social inclusion (including access), equity, the promotion of equality and a respect for diversity 	+	the existing public sports centre may be retained in situ so they are more easily accessible by the community should result in positive outcomes for all the Social SA objectives. The site surroundings	
	12. Ensure that social and community uses and facilities which serve a local need are enhanced, protected, and to encourage the provision of new community facilities	++	are in the top 10% nationally of crime, housing, and multiple deprivation and positive development in the area should help mprove housing availability and potentially reduce crime and fear of crime through greater footfall and improved street network	
	13. To aim that the housing needs of the Royal Borough's residents are met	+	permeability. Planting and landscaping is expected to improve the visual amenity of the surrounding properties which should be to the benefit of the urban environment, housing and community well-	
	15. Ensure the provision of accessible health care for all Borough residents	+	being.	
Economy	 To support a diverse and vibrant local economy to foster sustainable economic growth 	?	Although the economic implications for this site are unclear at this stage, the Latimer area contains other operational and commercial properties which could benefit from this proposal and the new school and additional/enhanced sports facilities could provide a small number of new jobs.	N/A

Кеу	Likely effect on the SA Objective
++	Significant positive benefit
+	Some positive benefit
0	No significant effect
Х	Some adverse impact
XX	Significant adverse impact
?	Uncertain or insufficient information on which to determine

Strategic Site: The former Commonwealth Institute

	SA Objective	Score	Comment	Recommendations
	1. To conserve and enhance the natural environment and biodiversity	?	Reuse and enhancement of the existing 'tent' building with the aim to develop it into a high trip	Recommendations to Allocation supporting policy text:
	5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables and adopt measures to adapt to climate change	?	generating public arts and cultural use should result in positive outcome for the SA objectives on previously developed land, energy efficiency and cultural heritage. The degree of positive	Consider the impact of increased traffic at the site (pedestrian and vehicular), if any, from increased visitor
	6. Reduce the risk of flooding to current and future residents	0	performance will be dependent upon the detailed project plans. The number of Grade II* listed	numbers and how this could be addressed in the context
	7. Improve air quality in the Royal Borough	?	buildings and registered parks and gardens and	of both the site and the
	8. Protect and enhance the Royal Borough's parks and open spaces	?	conservation areas in and around the site could be impacted upon negatively by increased visitor	Kensington High Street Place
	9. Reduce pollution of air, water and land	?	numbers, or alternatively could benefit from	
	9a. Prioritise development on previously developed land	+	increased investment and interest in the area – this would be dependent upon appropriate planning.	
Environment	10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic	?	There is uncertainty regarding the impact of the proposed development on local biodiversity and the natural environment, however, the identified	
Envi	11. Reduce the amount of waste produced and maximise the amount of waste that is recycled	?	constraints of the site (such as those mentioned above) should ensure any development is delivered	
	14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials	+	in the context of fully understanding the local environment. A number of trees on the site are protected by Tree Preservation Orders and are also	
	16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage	+	identified as constraints to be considered when planning for any development. The extent to which the project will contribute to reducing effects on climate change, reduce pollutants and reduce waste is unknown; however, efforts should be made to discourage visitors travelling to the Institute by car. The major planning application at the site proposes car and motorcycle parking, and it is unclear to what extent the use of sustainable forms of transport and lowered car dependency would be promoted.	
			The site has a low risk of flooding.	

	SA Objective	Score	Comment	Recommendations
	2. Reduce crime and anti-social behaviour and the fear of crime	?	The site should help contribute to positive improvements on the SA objectives on equalities and social and community facilities, assuming that the facilities are open and accessible to all. Additional residential or commercial development could	N/A
	 Encourage social inclusion (including access), equity, the promotion of equality and a respect for diversity 	+	contribute partly towards the Borough's housing and social needs, particularly if the planning application is granted for retail, restaurant and cafe, office, storage and ancillary uses, two residential buildings and one mixed use building. The proposed mixed use	
Social	12. Ensure that social and community uses and facilities which serve a local need are enhanced, protected, and to encourage the provision of new community facilities	+	building includes several facilities of benefit to residents in terms of community and social well- being, such as a cinema, fitness centre and swimming pool. Impacts of the development on local crime levels are uncertain.	
	 To aim that the housing needs of the Royal Borough's residents are met 	?		
	15. Ensure the provision of accessible health care for all Borough residents	0		
Economy	3. To support a diverse and vibrant local economy to foster sustainable economic growth	+	The site proposal should have positive impacts on employment and the local economy, however, the extent to these impacts is uncertain at this stage. Potential additional commercial (or residential) development could positively contribute towards the Borough's economy by generating more jobs, employees and residents looking to use local services. In particular, if the current planning application (or a similar application) goes ahead, this includes facilities for economic benefit such as: retail, restaurant and cafe, office, storage and ancillary uses, cinema, fitness centre and swimming pool.	N/A

Кеу	Likely effect on the SA Objective
++	Significant positive benefit
+	Some positive benefit
0	No significant effect
Х	Some adverse impact
XX	Significant adverse impact
?	Uncertain or insufficient information on which to determine

Strategic Site: Warwick Road

	SA Objective	Score	Comment	Recommendations
	1. To conserve and enhance the natural environment and biodiversity	?	The five sites including 100 West Cromwell Road propose a variety of development including: a minimum of 1,700 residential units, associated	 Identify that sustainable design and construction will be a principle of the
	 Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables and adopt measures to adapt to climate change 	+	infrastructure for community and social uses, and on- site public open space and amenity space provision. This should result in positive effects on the parks and open spaces and previously developed land SA	development and that it will maximise the opportunities of scale that the combined site offers.
	Reduce the risk of flooding to current and future residents	0	objectives, particularly given that site specific infrastructure and planning obligations have been	Recommendations to Allocation
	7. Improve air quality in the Royal Borough	?	identified for public open space and landscaping	supporting policy text:
	8. Protect and enhance the Royal Borough's parks and open spaces	+	improvements.	 Site potential for improving waste management should
t	9. Reduce pollution of air, water and land	0	Infrastructure and planning obligations for pedestrian	be considered.
umen	9a. Prioritise development on previously developed land	+	and cycle improvements and the intention to deliver necessary infrastructure should promote traffic	 Assess level of land contamination, if any, and
Environment	10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic	+	reduction and encourage the use of sustainable forms of transport. Building a 'coordinated sustainable development'	how this could be addressed through the allocation.
	11. Reduce the amount of waste produced and maximise the amount of waste that is recycled	?	should minimise effects on climate change, although specific mention of the requirements for sustainable design and construction is a noticeable omission	
	 Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials 	?	from the 'Principles' given the combined size of the proposed development. It is also unclear how waste will be treated.	
	16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage	0	The site contains areas of high risk for surface and sewerage water flooding according to the sequential test and will require mitigation. The allocation mentions that the site has passed the sequential test as required by PPS25.	

	SA Objective	Score	Comment	Recommendations
	2. Reduce crime and anti-social behaviour and the fear of crime	+	The development should contribute significantly to the Borough's housing target and will aim to create a sustainable and high-quality environment, therefore having a positive effect on the housing SA objective. The identified infrastructure and planning obligations	N/A.
	4. Encourage social inclusion (including access), equity, the promotion of equality and a respect for diversity	+	focus on the provision of community and social infrastructure including a primary school, crèche, affordable housing, health facilities and social and community facilities amongst others. Based on this, delivery of the development at the Warwick Road	
Social	12. Ensure that social and community uses and facilities which serve a local need are enhanced, protected, and to encourage the provision of new community facilities	+	sites is likely to have positive effects on the SA objectives for equalities, social and community facilities, healthcare and housing. The area experiences high levels of housing deprivation and therefore measures to increase housing delivery in	
	13. To aim that the housing needs of the Royal Borough's residents are met	++	this area are welcomed. The design of the development to consider community safety and an infrastructure and planning obligation to provide floorspace for a Safer Neighbourhoods unit, should help reduce crime and anti-social behaviour.	
	15. Ensure the provision of accessible health care for all Borough residents	+		
Economy	3. To support a diverse and vibrant local economy to foster sustainable economic growth	+	The proposed developments would cumulatively deliver a variety of retail, leisure, community and business use facilities which should aid in supporting and developing the local economic base.	N/A.

Кеу	Likely effect on the SA Objective
++	Significant positive benefit
+	Some positive benefit
0	No significant effect
Х	Some adverse impact
XX	Significant adverse impact
?	Uncertain or insufficient information on which to determine

Strategic Site: Earl's Court

SA Objective	Score	Comment	Recommendations
1. To conserve and enhance the natural environment and biodiversity	+	The site will be developed on previously developed land and although there is little comment with	N/A.
5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables and adopt measures to adapt to climate change	++	regards to the natural environment, it is stated in the infrastructure and planning obligations additional open space, including considering opportunities to create biodiversity and the allocation mentions that	
residents	?	Garden of Historic Interest should be carefully	
8. Protect and enhance the Royal Borough's parks		conserve and enhance the natural environment and	
9. Reduce pollution of air, water and land	?	Borough's parks and open spaces as the whole site	
land	+	deficient'. Furthermore, the design should take into	
10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic	+	residential amenity and views, which should have a positive impact towards reinforcing local distinctiveness, environmental quality and conserving	
11. Reduce the amount of waste produced and maximise the amount of waste that is recycled	0		
 Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials 	++	provision of office space and residential units has identified the opportunity for establishing a CCHP or	
16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage	+	help minimise the proposed development's impacts on climate change and have significant positive impacts for the climate change and energy efficiency SA objectives. The identified infrastructure and planning obligation to help unravel the Earl's Court One Way System and improve traffic circulation should help reduce congestion, improve local environmental quality and potentially reduce local air pollution and improve air quality. However, improving the transport infrastructure and capacity will be highly challenging and this can not be commented upon with certainty, although the above obligations have been identified.	
	 To conserve and enhance the natural environment and biodiversity Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables and adopt measures to adapt to climate change Reduce the risk of flooding to current and future residents Improve air quality in the Royal Borough Protect and enhance the Royal Borough's parks and open spaces Reduce pollution of air, water and land Prioritise development on previously developed land To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic Reduce the amount of waste produced and maximise the amount of waste that is recycled Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials To reinforce local distinctiveness, local environmental quality and amenity through the 	1. To conserve and enhance the natural environment and biodiversity+5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables and adopt measures to adapt to climate change++6. Reduce the risk of flooding to current and future residents?7. Improve air quality in the Royal Borough+8. Protect and enhance the Royal Borough's parks and open spaces+9. Reduce pollution of air, water and land?9a. Prioritise development on previously developed land+10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic+11. Reduce the amount of waste produced and maximise the amount of waste produced and maximise the re-use of building and the recycling of building materials014. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials+++16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage++	1. To conserve and enhance the natural environment and biodiversity + 1. To conserve and enhance the natural environment, and biodiversity + 5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables and adopt measures to adapt to climate change + 6. Reduce the risk of flooding to current and future residents + 7. Improve air quality in the Royal Borough and open space. + 9. Reduce pollution of air, water and land ? 9a. Prioritise development on previously developed land ? 10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic + 11. Reduce the amount of waste produced and maximise the amount of waste produced and environmental quality and amenity more so to building design to maximise the re-use of building and enhancement of cultural heritage 0 14. Encourage energy efficiency through the conservation and enhancement of cultural heritage +++ ++ +

	SA Objective	Score	Comment	Recommendations
			recycling facilities and/or anaerobic digestion should have a positive impact on the waste SA objective.	
			The site contains a high risk of surface water and sewerage flood risk as identified in the sequential test and will require mitigation. The allocation mentions that the site has passed the sequential test as required by PPS25 and the exception test would have to be undertaken.	
	2. Reduce crime and anti-social behaviour and the fear of crime	?	Continued use of Earl's Court as a cultural facility should enable a positive effect on the equalities SA objective if accessible to all members of society. Delivery of residential units would help in meeting the housing needs of the Borough's residents in an area	N/A.
	 Encourage social inclusion (including access), equity, the promotion of equality and a respect for diversity 	+	in the top 10% most deprived in terms of housing deprivation. The infrastructure and planning obligations has identified the requirement for affordable housing and should help deliver a positive response to the housing SA objective.	
Social	12. Ensure that social and community uses and facilities which serve a local need are enhanced, protected, and to encourage the provision of new community facilities	+	As a mixed-use development, the site should also provide education, health, public open space, community facilities and shops for day-to-day needs. In addition to the infrastructure and planning	
	 To aim that the housing needs of the Royal Borough's residents are met 	+	obligations for community, health, education and public open space contributions; there should be a positive social impact generally, particularly for social and community facilities and accessible health care.	
	15. Ensure the provision of accessible health care for all Borough residents	+	The extent to which crime would be reduced is not clear.	

	SA Objective	Score	Comment	Recommendations
Economy	3. To support a diverse and vibrant local economy to foster sustainable economic growth	+	The proposed development should help support the local economy, in particular if the potential for office space provision is realised. Just to the south of the site lies an area in the top 10% most deprived in terms of employment and any additional job creation in the area should help improve this situation. New employment, hotels, leisure, offices, and associated facilities, as part of the wider Earl's Court site, should also have a positive impact on local economy.	N/A.

Кеу	Likely effect on the SA Objective
++	Significant positive benefit
+	Some positive benefit
0	No significant effect
Х	Some adverse impact
ХХ	Significant adverse impact
?	Uncertain or insufficient information on which to determine