LDF

LOCAL DEVELOPMENT FRAMEWORK

Building on Success

THE ROYAL BOROUGH OF
**KENSINGTON
AND CHELSEA**

PAS Soundness Self Assessment
for the Submission Core Strategy
Development Plan Document

March 2010

Soundness tool

Key question	Evidence provided
Justified	
Participation	
1. Has the consultation process allowed for effective engagement of all interested parties?	Yes, engagement and consultation with residents, statutory bodies, stakeholders and interested parties were carried out throughout the plan-making process. The 'Proposed Submission Core Strategy Consultation Report' (October 2009) (http://www.rbkc.gov.uk/pdf/Consultation%20Report%2029%2010%209.pdf) provide information on who was consulted, the consultation methods and the summary of the main consultation issues raised and council response throughout the development of the Core Strategy. This document covers the following stages: • Issues and Options • Interim Issues and Options Core Strategy and North Kensington Area Action Plan (NKAAP) • Towards Preferred Options Core Strategy and North Kensington Plan • Places and Strategic Sites • The Draft Core Strategy with a particular focus on North Kensington The 'Statement of Consultation Regulation 28 (2)' sets out the number of representations received on the Submission draft and the summary of main issues raised. This consultation report can be found in the examination webpage of the LDF.
Research/ fact finding	
2. Is the content of the development plan document justified by the evidence? 3. What is the source of the evidence? 4. How up to date and convincing is it?	2. The Core Strategy is justified by the evidence. The Core Strategy is based in a large amount of up-to date evidence. This includes, but is not limited to, the following documents: • Walkable Neighbourhoods and Reasoned Justification on Social and Community Uses. October 2009. • Retail and Leisure Needs Study, July 2008. • Royal Borough of Kensington and Chelsea: Employment Land Review - Update. Roger Tym & Partners, October 2009 Final. • Royal Borough of Kensington and Chelsea, Strategic Housing Market Assessment (SHMA) Main Report November 2009, Fordham Research. • The London Strategic Housing Land Availability Assessment and Housing Capacity Study 2009. Mayor of London October 2009. • Royal Borough of Kensington and Chelsea, Affordable Housing Viability Study, Final Draft Report September 2009. Fordham Research. • Royal Borough for Kensington and Chelsea: Strategic Flood Risk Assessment 2009.

Key question	Evidence provided
	• Royal Borough of Kensington and Chelsea Infrastructure Delivery Plan. January 2010. The following webpage contains the full list of evidence base: http://www.rbkc.gov.uk/planningandconservation/planningpolicy/evidencebasedocuments.aspx 3. The source of the evidence base are internal reports (Sequential Test 2009, Waste Report 2009, Equalities Impact Assessment of the Core Strategy and North Kensington Plan 2009), reports commissioned to consultants (Strategic Environmental Assessment/Sustainability Appraisal, 2005-2009, SHMA, 2009, etc) and regional and national policies and reports such as: London Town Centre Network, Review for the London Plan, Provisional findings, GLA April 2009; Mayor of London. Draft Supplementary Planning Guidance. Use of planning obligations in the funding of Crossrail, May 2009; Mayor for London/TfL: Travel in London Report. Key trends and developments. Report number 1. 2009; The London Strategic Housing Land Availability Assessment and Housing Capacity Study 2009. Mayor of London October 2009. The Policy Formulation Matrix 2009 along with the Policy Formulation Report 2009 (http://www.rbkc.gov.uk/planningandconservation/planningpolicy.aspx) explains how evidence base informed the development of policies. For example, in policy CH2 'Housing Diversity' the split between social rented and intermediate housing reflects the latest evidence available. In the same way, changes in policy CE1 'Climate Change' were made to reflect findings from consultation and confirmed evidence gathering. Relevant evidence is also referenced throughout the Core Strategy document. An extensive list of the evidence base is also included in chapter 43 of the Core Strategy and is divided in sections related to each chapter of the Core Strategy. The 'Proposed Submission Core Strategy Consultation Report' (October 2009) provide information on who was consulted, the consultation methods and the summary of the main consultation issues raised and the Council response throughout the development of the Core Strategy. Relevant evidence is referenced throughout the Core Strategy. Examples include: • Supporting text to policy CF1: 'Location of New Shop Uses'. Paragraphs 31.3.1 and 31.3.2, 31.1.15 refer to the Council's 'Retail Needs Assessment' (July, 2008). • Supporting text to policy CH1: 'Housing Targets'. Paragraph 35.3.1, refers to the 'London-wide Strategic Housing Land Availability Assessment (SHLAA)' (2009). Paragraphs 35.3.6 and 35.3.7 refer to the report: 'Royal Borough of Kensington and Chelsea: Strategic Housing Market Assessment' (2009). • Supporting text to policy CE2: 'Flooding', paragraph 36.3.17 refers to the Strategic Flood Risk Assessment (2009) Moreover, references to the evidence base can be found in all the chapters in form of footnotes. Representations on the matter from the Government Office for London (GOL) states that GOL *believes that the most critical elements of evidence have largely been updated in recent years (2008/9). This includes, for example: the Employment Land Review Update, the Retail Needs Assessment, the Affordable Housing Viability Study and the SHMA (as referenced in Chapter 43).* (para 8 of letter dated 10 December 2009).

Key question	Evidence provided
5. What assumptions had to be made in preparing the development plan document? 6. Are the assumptions reasonable and justified?	5. One important evidence base document, the SHLAA, was produced by the GLA. This SHLAA was driven by the nationally set requirement to identify sufficient sites for at least the first 10 years of an LDF and where possible for longer than the whole 15 year plan period. In line with national guidance, the study recognises it is not possible to accurately identify sufficient sites in London for the whole of the life of an LDF. Thus, the study provides the evidence base to support judgements around whether broad locations should be identified and/or whether there are genuine local circumstances that mean a windfall allowance may be justified in the first 10 years of the plan. The study's methodology has built on the experience of four previous pan-London Housing Capacity Studies (HCS), in particular the last study undertaken in 2004 which had many of the characteristics of what is now a SHLAA. The full methodology and assumptions on which it is predicated are set out in the SHLAA (see the RBKC Core Strategy evidence base). With regard to demographic projections, those produced by the Greater London Authority (GLA) for service and policy planning have been used for the Core Strategy. These have the advantage of being produced on an annual basis. They have been used in preference to pure trend based ONS sub-national Population Projections and DCLG Household Projections because they link population and household change to borough capacity to accommodate them. The 'Sustainability Appraisal Report' (October 2009) (http://www.rbkc.gov.uk/pdf/SA_report_October2009.pdf) identifies in section 4.2 the key assumption that all the policies in the Core Strategy would be fully implemented and highlights evident tensions between priorities or situations where full implementation may be problematic. The recommendations of the appraisal took into account this key assumption. In line with the Consultation Draft London Plan we have assumed that the Royal Borough will experience a cyclical recovery from the current recession and the Core Strategy has been written to plan for future growth. However, a contingencies and risks section has been included at Chapter 39 of the Core Strategy to provide flexibility in case this growth is not realised. Other evidence studies prepared to support the Core Strategy include relevant assumptions. For example, the 'Affordable Housing Viability Study' (2009) involved the preparation of financial appraisals for a representative range of sites to give a picture of the Royal Borough wide ability of such sites to afford given targets for affordable housing. The approach was to 'model' viability using a range of variables and the consultant's spreadsheet software. In arriving at appropriate assumptions for residential development on each site, the development form in an approved planning application was an important consideration. However, the application could now be so historic, that it represents something that would neither be proposed now, nor be permitted. After consideration the consultants took the view that the built form in the current application remained the best basis for carrying out appraisals. Please see individual evidence studies for more detail for the specific assumptions made. We consider that all the assumptions are reasonable and justified based on the evidence.

Key question	Evidence provided
Alternatives	
7. Can it be shown that the council's chosen approach is the most appropriate given the reasonable alternatives? 8. Have realistic alternatives been considered and is there a clear audit trail showing how and why the preferred strategy/approach was arrived at? 9. Where a balance had to be struck in taking decisions between competing alternatives is it clear how and why these decisions were made?	Yes, it can. The 'Proposed Submission Core Strategy Consultation Report' (October 2009) provides information on who was consulted, the consultation methods and the summary of the main consultation issues and options raised and the Council response throughout the development of the Core Strategy. This document covers the following stages which refer specifically to the consideration of alternatives and options: • Issues and Options • Interim Issues and Options Core Strategy and North Kensington Area Action Plan (NKAAP) • Towards Preferred Options Core Strategy and North Kensington Plan The Sustainability Appraisal sets out in chapters 3 and 4 the alternatives considered in the Core Strategy. In particular, it gives an explanation for selecting each of the preferred strategic sites allocated in the Core Strategy. Moreover, the 'Sustainability Appraisal Update Report' (2009) explains in sections 4 and 5 the appraisal of options, mitigations and conclusions of the early stages of the Core Strategy. The 'Policy Formulation Report' (November 2009), was produced together with the policy formulation matrix to consider the evolution of the policies within the Submission Core Strategy. It lists each of the options for policies, or the proposed policies themselves, at each stage of the process and sets out how these have been taken forward in the process. Where an option has not been taken forward the matrix explains why. This policy formulation report should be read in conjunction with the reasoning matrix. Its intention is threefold; to summarise the main alternatives and the results from the consultation and to put this in the context of any guidance which is if particular relevance; to make links to the Kensington and Chelsea Partnership's Community Strategy; and to link to the results of the Council's Sustainability Appraisal (SA). This report explains that the Council did not offer a series of 'options' for the Places, as each place vision is made up of a range of different actions. The public were, however, given the opportunity to reject or support the vision as a whole, or its constituent parts. An example included in the Policy Formulation Report is the evolution of policy for Kensal Place (paragraphs 2.1 to 2.5): "Kensal represents one of the Borough's largest opportunities for wide scale regeneration. With the addition of a Crossrail station, benefits are likely to extend into neighbouring boroughs and positively contribute to regeneration throughout north/west-central London. Several options have been presented for Kensal throughout various iterations of the Core Strategy. Originally, consultation on the North Kensington Area Action Plan asked the question as to whether regeneration should result in modest, medium or significant change. Overwhelmingly support was for significant change, and as a result, the 'Towards Preferred Options' consultation looked at what type of development could take place. Again, three options were presented. The first suggested residential-led development with the potential of accommodating up to 5,000 new homes, a mixed use scheme able to deliver 2,500 dwellings and 450,000m2 of commercial floorspace, or a single use campus for a hospital, educational institute or similar. Support was fairly balanced in favour of the mixed use and campus uses. Due to the need to extract value from the campus, plus the need for all site owners to develop their sites in unison, a mixed use scheme has been favoured. The mixed-use approach was considered as the most practical and suitable option for Kensal. It is the option most likely to deliver a Crossrail station as it will have a continual use throughout the day, not just at rush hours and will also be in keeping with the proposed density of

Key question	Evidence provided
	development in the north of the Borough. The use also facilitates an extended retail offer and a variety of social community uses which should stimulate an engaged local community. This approach is supported by key stakeholders and the Sustainability Appraisal (SA) suggests that a comprehensive mixed use redevelopment will deliver significant benefits to an area in need of regeneration. The SA also states that although redevelopment on a large scale would require considerable expenditure of energy during construction, a development with an emphasis on sustainability would bring significant improvements in building energy efficiencies, public transport infrastructure and provide opportunities for the incorporation of renewable technologies. Further to this, the SA states that Kensal, as a 'Place', has shown significant positive impacts on climate change, transport, cultural heritage and the economy. It should be noted that the Mayor also notes the potential of Kensal and proposes it to be designated as an Opportunity Area in the Consultation Draft version of the London Plan. These are areas which are designated because they have *"significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility."* Representations on this matter from the Government Office for London (GOL) state that: *"Earlier stages of the plan preparation process set out the key issues and options for development in the Borough. These were developed within the overall strategy which has the key aim of regenerating the north of the Borough (and included high, medium and low growth options for North Kensington). The Core Strategy policies have been worked up from these options following extensive consultation. In our view, the Council has a clear audit trail of how the document has been shaped."* (paragraph 9 GOL letter dated 10 December 2009)
10. Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the development plan document from the start?	Yes, the Sustainability Appraisal shows the performance of the different options. Sustainability considerations informed the content of the development plan document from the start. Scott Wilson was commissioned to produce the Sustainability Appraisal. The process of Sustainability Appraisal started in 2005 following a five week period of public consultation after which the Council produced an Addendum Scoping Report. The Scoping Report set out what is considered to be the appropriate context for the appraisals that have been carried out; it established the Royal Borough's environmental baseline; it listed the sustainability appraisal objectives which are considered to be most appropriate for the Royal Borough; and it decides on the scope of the future appraisal. The Council used the Scoping Report as the basis of carrying out the sustainability appraisal of the various options outlined within the Issues and Options paper. An Interim Sustainability Appraisal Report (ISAR) (http://www.rbkc.gov.uk/pdf/isar_final_report.pdf) documented the findings of this options appraisal. The Council took the findings of this independent appraisal into account when progressing the LDF to the 'preferred options' stage of the process. In 2009, the Council produced a Sustainability Appraisal Update Report which is a non-statutory report and aims to inform statutory consultees and stakeholders of the SA process that has occurred. This report also looked to identify how the SA has influenced the preparation of the plan, providing an update to the Scoping Report, prepared in 2005, and reporting any suggested changes to the SA framework to undertake the appraisal of the Core Strategy. The Council produced a final Sustainability Appraisal of the Proposed Submission Core Strategy in July 2009 and updated it in October 2009 to include the changes made to the Core Strategy as a result of the consultation process. Recommendations from the different iterations of the Core Strategy were taken into account when developing the policies in the Core Strategy. The 'Policy Formulation Report' (November 2009) lists each of the options for policies at each stage of the process and sets out how these have been taken forward in the process and where an option has not been taken forward the matrix explains why. It summarises the main alternatives and the results from the consultation, putting this in the context of any relevant

Key question	Evidence provided
	guidance; makes links to the Kensington and Chelsea Partnership's Community Strategy (http://www.rbkc.gov.uk/kcpartnership/general/community_strategy2008-18.pdf) and links to the results of the Council's Sustainability Appraisal (SA). For example, this report explains the development of Policy CE3: 'Waste' (paragraphs 4.219-4.224). It includes an explanation of the recommendations and findings of the different iterations of the Sustainability Appraisal process: "The ISAR stated that options should include combined measures to ensure that waste is disposed of effectively and options should attempt to minimise the production of waste. Options of other forms of waste disposal and recycling should be put forward due to poor accessibility to some recycling and waste disposal facilities such as Cremorne Wharf. The final sustainability appraisal identified the benefits to the environment of this policy and the fact that they are unlikely to constrain the social or economic SA objectives".
11. Does the development plan document adequately expand upon regional guidance rather than simply duplicate it? 12. Does the strategy take forward the regional context reflecting the local issues and objectives?	Yes, the Core Strategy expands upon regional guidance taking into account the local circumstances. Examples of this can be found in the following sections of the Core Strategy: • The reasoned justification to policy CF2 'Retail Development within Town Centres' explains how the GLA hierarchy of shopping centres has been expanded to include Portobello Road and Westbourne Grove as Special District Centres. This was done to reflect their unique function in having an important local role but also attracting many thousands of people from across London and beyond. • Policy CE 1: 'Climate Change' expands on London Plan Policy 4A.1 which set out the Major of London's current response to climate change. It provides detail on the requirements for CCHP in strategic sites and other major development and requirements to connect to district heat and energy network. The Council received a letter from the GLA dated 9 December 2009 (correspondence with the GLA attached) with regard to the Proposed Submission Core Strategy and its general compliance with the London Plan. In paragraph 17 of the 'Proposed representations' the Mayor expressed the view that the Submission Document for the Core Strategy and Proposals Map were, on the whole, broadly consistent with the London Plan. There were, however, some few issues of general conformity. These general conformity issues relate to affordable housing targets, the protection of hotel use within the Earl's Court ward; open space and tall buildings. The Mayor also submitted representations on climate change and transport that did not relate to general conformity. The Council met the GLA on 18 January and later sent them a letter as a response dated 8 March 2010. The response was in the form of a table with reference to the paragraph number of the original letter and report. In addition to this there are two papers, one of which was sent to the GLA prior to our response on the 9 December regarding the need for an Open Space Strategy. This was enclosed together with some further supporting documentation to address the concern regarding the absence of a specific Open Space Strategy, namely open space ward profiles and an analysis of need within the Royal Borough which should be read in conjunction with the Open Space Audit. The other paper deals with the justification for the lack of designation of specific areas in the Borough for tall or high buildings, specifically at Kensal and Earl's Court which are proposed to be Opportunity Areas in the Draft Consultation London Plan. The Council considers that the Core Strategy is in general conformity with the London Plan. A response from the Mayor should be available at the time of Submission.

Effective	
Deliverable	
13. Has the council clearly identified what the issues are that the development plan document is seeking to address? 14. Have priorities been set so that it is clear what the development plan document is seeking to achieve?	In the early stages of the preparation of the Core Strategy, the Council produced the Planning Policy Issues and Options report, which sought the consultees' views on key issues for planning in the borough and on the options available for addressing them. This document stated the unique characteristic of the Borough and it also established the Council's spatial vision and strategic objectives. The outcomes of the consultation of this document were taken into consideration when writing the subsequent iterations of the Core Strategy. In the Submission Core Strategy, the Council have established the vision, which is to build on success; and the strategic objectives, which flow from the vision: -To keep life local -To foster vitality -To offer better travel choices -To maintain and extend our engaging public realm -To renew our legacy -To achieve a diversity of housing -To respect environmental limits To further develop the strong and varied sense of place of the Borough, the Council states in the Core Strategy that it will, in partnership with other organisations and importantly with its residents: -Stimulate **regeneration** in North Kensington -Enhance the **reputation** of our national and international destinations -Uphold our **residential quality of life** The above are clear priorities that have been set out and they are the conclusions to the strategic issues. They can be found at paragraph 2.3.19 of the Submission Core Strategy. Representations from GOL in their letter dated 10 December 2009 state*: "The document does contain a spatial strategy identifying the broad locations for development in the Borough (focussing particularly on regeneration in North Kensington) and the approach is locally distinctive and place-shaping."* (paragraph 5)
15. Are there any cross-boundary issues that should be addressed and, if so, have they been	The revised London Plan identified Earl's Court as an Opportunity Area. This site includes land in both boroughs, Kensington and Chelsea and Hammersmith and Fulham. Chapter 10 and 26 of the Core Strategy refers to the Spatial Strategy and the Delivery Strategy of Earl's Court respectively. Both boroughs and the land owners have been in discussions regarding a comprehensive regeneration and improvement scheme. The landowners will work with the planning authorities of both boroughs, key local stakeholders and

adequately addressed?	the local community to establish how this can be achieved. Transport for London and the Greater London Authority (GLA) are also partners in the planning and delivery of the future development on the wider Earl's Court site.

A scheme for the whole Regeneration Area will be agreed with both boroughs in a joint SPD that will be produced by 2011.

In addition to this, the SFRA, which was a key evidence document for the Core Strategy, was commissioned jointly with the London Borough of Hammersmith and Fulham.

There are other references to cross-boundary issues within the Core Strategy, such as:
-cycle and walking paths through the Borough, linking Hammersmith and Fulham with Westminster.
-Western Riverside Waste Authority Joint Municipal Waste Management Strategy 2006-2011, which, the Borough is part of, together with Hammersmith and Fulham, Lambeth and Wandsworth. The Council will produce a DPD to show how the waste apportionment figure required by the London Plan by 2020 will be met.
-Little Wornwood Scrubs, which management was transferred from the London Borough of Hammersmith and Fulham to the Royal Borough in 2008. The Council will work with Hammersmith and Fulham Council to provide a joint plan for the area north of Little Wormwood Scrubs, which is a designated employment zone within the London Borough of Hammersmith and Fulham.

Representations on this matter from the Government Office for London (GOL) in their letter dated 10 December 2009 state: "*Cross-boundary issues are identified in the introductory sections of the document and corporate or partnership actions are identified for the strategic objectives of the plan (e.g. diversity of housing p223). Partners involved in infrastructure delivery are identified in the table in Chapter 37 referred to above. We welcome this material. The Council is also working with Hammersmith and Fulham on cross boundary issues by seeking better links via public transport, working jointly on a plan for the area north of Little Wormwood Scrubs, the Earls Court Exhibition site and Earls Court area.*" (paragraph 14). |
| 16. Does the development plan document contain clear objectives? | The Core Strategy sets out a series of clear objectives and the policies that will help deliver these objectives. Strategic Objectives are dealt with in Chapter 3 of the Core Strategy and they flow from the 'Vision for the Royal Borough: Building on Success' (CV1). Table 3.1 (page 39) shows how specific issues have been expanded and translated into seven strategic objectives for the Borough. These are then expanded upon so that they have their own chapter (chapters 30-36) with appropriate Development Management policies and Corporate and Partner Actions for achieving the objective. |
| 17. Are the objectives specific to the place; as opposed to being general and applicable to anywhere?
18. Is there a direct relationship between the | Yes, they are. The Council has taken great care to ensure that the Strategic Objectives are not bland topic statements, but express what the issue for each topic in the Royal Borough is. For example, there is not a theme "transport", but "better travel choices"-ensuring sustainable modes are easy and convenient.

There is a chapter dedicated to each strategic objective. Each of these chapters includes a section identifying issues that are locally distinctive, which is called "What this means for the Borough".

Chapter 2 of the Core Strategy sets out an analysis of different issues in the Borough, to establish spatial patterns and |

identified issues and the objectives?	common themes, to inform the shaping of the Vision and Strategic Objectives. It draws heavily on The Picture of Our Community, a companion guide to the Community Strategy. Chapter 3 of the Core Strategy includes a table that explains how the Strategic Objectives cover the issues identified and how the topic is going to be addressed. Table 3.1 (page 39) shows how specific issues have been expanded and translated into seven strategic objectives for the Borough. These are then expanded upon so that they have their own chapter (chapters 30-36) with appropriate Development Management policies and Corporate and Partner Actions for achieving the objective. Representations from GOL in their letter dated 10 December 2009 state: *"The document does contain a spatial strategy identifying the broad locations for development in the Borough (focussing particularly on regeneration in North Kensington) and the approach is locally distinctive and place-shaping."* (paragraph 5)
19. Is it clear how the policies will meet the objectives? 20. Are there any obvious gaps in the policies, with regard to the objectives of the development plan document?	Yes, it is. Planning policies are set out in each section of the Core Strategy, with a summary of the relevant evidence being provided as reasoned justification for the policy that follows and how they will meet the objectives. Chapters 30- 36 deal specifically with development management policies and the corporate or partnership actions which will meet the strategic objectives There are not any gaps in the policies with regard to the objectives, as the policies derive from the topics identified to address the Strategic Objectives. For example, the policies that would address the Strategic Objective of 'Keeping Life Local' are those that deal with social and community uses, local shopping facilities, and the concept of "walkable neighbourhoods". All these policies have been tailored to address and implement the strategic objective and there are no obvious gaps in the policies to meet the strategic objectives. Chapter 44 of the Core Strategy covers the relationship to the Community Strategy, and how the Core Strategy's Strategic Objectives and policies address the aims of the Sustainable Community Strategy. For instance, Aim 4 of the Environment and Transport Section is to promote energy efficiency, recycling and the reduction of pollution. This is covered in the Core Strategy by Strategic Objectives CO3: Better Travel Choices and CO7: Respecting Environmental Limits; and by the Policies CT1: Improving Alternatives to Car Use, CT2: New and enhanced rail infrastructure, and CE5: Air Quality.
21. Are there realistic timescales related to the objectives?	Yes, there are. Section 2A of the Core Strategy deals with the delivery strategy of the strategic sites. Each chapter contains the projected delivery milestones and risks associated with the delivery of that specific site. There is also a schedule in the Infrastructure Delivery Plan divided by area and also by provider, with realistic timescales. The Housing Trajectory of the Borough is included in Chapter 40 of the Core Strategy and covers the plan period of the Core Strategy until 2028. It contains the estimated provision of housing within the Borough, and our performance against the targets. The Housing Trajectory is updated every year in the Annual Monitoring Report

22. Are the policies internally consistent?	Yes, they are. All the policies in the Core Strategy are set out to deliver the seven Strategic Objectives, and cross-references between policies that cover the same objective are provided. For example, Climate Change, Waste, Flooding, Biodiversity, Air Quality and Noise policies all refer to protecting our natural resources, which is one of the seven Strategic Objectives (Respecting Environmental Limits).
23. Does the development plan document contain material which: • is already in another plan • should be logically be in a different plan • should not be in a plan at all?	No, it does not. The Core Strategy does not repeat material which is already part of another plan; neither there is any material that should not be included in the plan. It sets out the specific issues that need to be addressed in the Royal Borough and provides a set of locally distinct policies to achieve this aim. The policy relationship between the adopted Unitary Development Plan (UDP) and the Core Strategy is set out in Chapter 41 of the Core Strategy, in a section called 'Policy Replacement Schedule'. The Local Development Scheme includes a Schedule of Proposed Local Development Documents. It explains that the Core Strategy sets out core spatial policies for the borough. It also includes allocations for the Borough's strategic sites, and the development management policies used to determine planning applications and corporate and partnership actions to achieve the strategic objectives and implement the vision of the Borough until 2028. The Government Office for London (GOL) did not raise any issues in relation to material that could either be removed, or moved to another DPD.
24. Does the development plan document explain how its key policy objectives will be achieved?	Yes, it does. Each policy of the Core Strategy includes its objective and how the Council will deliver it. For example, the objective of Policy CF4, 'Street Markets', is for the Council to ensure that street markets remain a vibrant part of the Borough's retail offer. To deliver this the council will: • protect all of the Borough's street markets including those at Portobello Road, Golborne Road and Bute Street; • support new, or the expansion of existing, street markets where this fits in with our broader retail strategy and our strategic objectives for the town centres in which they would be located within or adjacent to; • require the protection of existing storage lockups for street traders, or their equivalent re-provision. In addition there is a section entitled 'Corporate and Partner Actions' at the end of each chapter dealing with a strategic objective (Chapters 30-36) which sets out the range of activities across the Council and by our partner organisations to deliver the objective. It sets out the main strategies and action plans that have been prepared that will play a part in delivering the objective and specific actions that will be taken.
25. If there are development management policies, are they supportive of the strategy and	Sections 30 to 36 of the plan include development management policies. They contain a summary of the relevant evidence being provided as reasoned justification for the policy that follows and how they are tailored to support the strategy and meet the strategic objectives. For example, Policy CK2, 'Local Shopping Facilities' aims to ensure opportunities exist for convenience shopping throughout the Borough. It is specified that the Council will meet this objective by protecting individual shops outside of

objectives?	designated town centres. The evidence of local shopping deficiency shows that this policy is required and it addresses the strategic objective of 'Keeping Life Local.'
26. Have the infrastructure implications of the strategy/policies clearly been identified?	Yes, they have. A section of the Core Strategy (Chapter 37) sets out and identifies infrastructure needs, with proposed solutions put forward. This section is underpinned by a substantial amount of evidence, in the form of a Borough Infrastructure Delivery Plan (IDP): http://www.rbkc.gov.uk/pdf/132%20Infrastructure%20Deliver%20Plan%20Jan%202010.pdf and a sub-regional Infrastructure Assessment (the Central London Infrastructure Study, 2009): http://www.rbkc.gov.uk/pdf/97%20Central%20London%20Forward.%20Infrastructure%20Study%20%20June%202009.pdf In addition to Chapter 37, each Strategic Site, as part of Section 2A Allocations and Designations, identifies the necessary infrastructure required as part of the delivery strategy. Section 2B Policies and Actions sets out the provision of necessary infrastructure alongside the various policies, but specifically within Policy C1 Infrastructure Delivery and Planning Obligations. The Council approach to infrastructure delivery is an on-going corporate process. At its heart is an infrastructure schedule listing details of infrastructure investment in the area. The schedule provides core information for all corporate and partner strategies. The schedule is a live document that will grow and develop over time as more partners engage in the process and contribute more infrastructure categories and information. To be effective the IDP needs to be kept up to date and, following Planning Advisory Service guidance, the IDP is seen as not only a product, but a process. This enables greater engagement with corporate partners and provides access to essential information and direction for policy development. Ensuring the schedule contains the information required for preparation is essential. The Kensington & Chelsea Partnership (KCP) is the Council's Community Partnership, and has played an active role in setting up the process. Updates are provided to the KCP main committee, with its sub-groups actively considering infrastructure requirements on an on-going basis. To achieve this information, the PAS templates were distributed, together with questionnaires, for setting up on-going dialogue with the partners. The Council's senior management board is fully committed to the Infrastructure Planning process, committing at the outset to ensuring the information is provided and shared in order to gain an understanding of infrastructure requirements (see Management Board meeting 27th May 2009) http://www.rbkc.gov.uk/KCPMeetingsMinutes/general/ldf_infrastructureneeds.pdf http://www.rbkc.gov.uk/KCPMeetingsMinutes/general/infrastructure_update.pdf
27. Are the delivery mechanisms and timescales for implementation of the policies clearly identified?	Yes, they are. The Delivery Strategy chapters (Section 2) of the Core Strategy, which includes the identified Strategic Sites, under 'Allocations and Designations' has a specific section on delivery, which sets out the risks, delivery milestones, delivery agencies and the funding arrangements. They are therefore clearly identified. In addition, the Infrastructure Delivery Plan (IDP) identifies the existing provision and capacity of infrastructure in the

	Borough, incorporating an element of contingency planning to show how objectives will be achieved under different scenarios. Early and continuous engagement with key partners and infrastructure providers and developers is seen as integral to this study.

Representations from the Government Office for London (GOL) in their letter dated 10 December 2009 state, "The Core Strategy makes reference to delivery issues and acknowledges infrastructure requirements at a number of points in the document. Chapter 37 of the Strategy sets out further detail of the infrastructure projects that will support and enable development, including *delivery lead, delivery period* and *funding arrangements."* (Paragraph 11). Furthermore, the queries raised by the Government Office in relation to the delivery of infrastructure have now been addressed. |
| 28. Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the strategy/policies? | Following the infrastructure evidence gathering, the Infrastructure Schedule was inserted into the 'Draft Core Strategy for the Royal Borough of Kensington & Chelsea with a focus on North Kensington', which was consulted on between July 24th and September 4th 2009. The representations received resulted in a number of changes to the schedule, and updating of the IDP itself, as reported to the KCP in September 2009.

The infrastructure table at chapter 37 of the Core Strategy sets out where infrastructure is required; what is required; why it is required; specific requirements; the lead delivery organisation; management organisation; cost; when; sources of funding and any dependencies. The timing of the provision of infrastructure complements the timescale of the strategy and the specific policies relating to the strategic sites and the 'Places.'

Following publication and consultation of the 'Proposed Submission Core Strategy for the Royal Borough of Kensington & Chelsea with a focus on North Kensington' (consultation 29th October – 10th December 2009), further comments and representations were received on the Infrastructure elements of the Core Strategy. GOL refer to Chapter 37 of the Core Strategy which sets out further detail of the infrastructure projects that will support and enable development, including delivery lead, delivery period and funding arrangements. They suggest that the Infrastructure Table would benefit from additional information in the 'Why' column setting out the number of homes/quantum of commercial development that is dependent on delivery of each infrastructure item, and requested further information on the IDP process. Amendments along these lines have been recommended to ensure that the infrastructure planning process is as robust as it can be.

The Delivery Strategy chapters (Section 2) of the Core Strategy, which includes the identified Strategic Sites, under 'Allocations and Designations' has a specific section on delivery, which sets out the risks, delivery milestones, delivery agencies and the funding arrangements. |
| 29. Is it clear who is intended to implement each part of the strategy/ development plan document? | Yes, it is clear who intended to implement each part of the Core Strategy. The implementation of each part of the Core strategy is set out in the different sections of the document:
- Each Place in the Core Strategy: (Section 1, Chapters 5 to 18) has a section on Delivery which includes the Quantum of Development and the Infrastructure needs. The Infrastructure needs relate to the Infrastructure Delivery table at Chapter 37 which identifies the lead organisation responsible for infrastructure delivery.
- Section 2A of the Core Strategy: 'Allocations and Designations' includes Strategic Site Allocations in which the |

30. Where actions required to implement policy are outside the direct control of the council, is there evidence of commitment from the relevant organisation to implement the policies?	delivery section identifies the risks for delivery, the delivery agencies, delivery milestones and funding arrangements. This is again linked to the Infrastructure Delivery table at Chapter 37 which identifies the lead organisation responsible for infrastructure delivery. • Section 2B of the Core Strategy: 'Policies and Actions' (Chapters 30 to 36) identifies the Corporate and Partner Actions that will be needed to deliver the policies. These include actions by the different departments of the Council and the partnership working with other stakeholders such as the GLA, PLA, NHS, TfL, Thames Water, etc. The relevant organisations are identified and they have confirmed their commitment to work in partnership with the Council. The Kensington and Chelsea Local Strategic Partnership are also involved in the identification and delivery of social infrastructure as part of the Core Strategy and they are specifically briefed roughly on a quarterly basis. They are committed to the process and a close working relationship is developing. • In terms of specific commitment a number of organisations such as Sainsbury's and Crossrail have now signed Statements of Common Ground and copies of these have been forwarded to PINS.
31. Does the development plan document reflect the concept of spatial planning? 32. Does it go beyond traditional land use planning by bringing together – and integrating – policies for development, and the use of land, with other policies and programmes from a variety of organisations that influence the nature of places and how they function?	31. The Core Strategy does reflect the concept of spatial planning. Section 1: 'Spatial Strategy' sets out: • The issues facing the Borough, the 'Spatial Portrait' (Chapter 2: Issues and Patterns); • The locally distinct Vision for the Borough, with supporting Strategic Objectives, (Chapter 3: Building on Success); • Where development is planned in broad terms (Chapter 4: Spatial Strategy); • How it will affect 14 key places in the Borough (Chapters 5-18). These 14 places represent the place in the Borough that will be undergoing considerable change, and all of the Council's district, major and international town centres. The exception to these categories is the Westway, which is included as a key component of the regeneration of North Kensington. Representations from GOL in their letter dated 10 December 2009 state*: "The document does contain a spatial strategy identifying the broad locations for development in the Borough (focussing particularly on regeneration in North Kensington) and the approach is locally distinctive and place-shaping."* (paragraph 5) 32. The Core Strategy goes beyond traditional land use planning by integrating the plans and programmes of a range of bodies and Council departments into our approach. These strategies and programmes are specified in section 4: 'Corporate and Partner Actions' of chapters 30 to 36. For example, chapter 36: 'Respecting Environmental Limits' include these actions amongst others: **Corporate or Partnership Actions for Respecting Environmental Limits** 1. The Council as a whole, and the Directorate of Transport, Environment and Leisure Services in particular, will implement the Council's Climate Change Strategy;

	2. The Council as a whole, and the Directorate of Transport, Environment and Leisure Services in particular, will implement the Carbon Management Programme and Environmental Strategy; 3. The Directorate of Planning and Borough Development will review the policy requirements for the existing building stock, including consideration of extensions and refurbishments, in 2012, with a view to increasing the contributions to environmental sustainability; 4. The Directorate of Planning and Borough Development and the Directorate of Transport, Environment and Leisure Services will work with the Greater London Authority, London Development Agency and London Councils to take a leading role in identifying new and existing opportunities for decentralised heat and energy networks through heat and energy masterplanning; 5. The Directorate of Planning and Borough Development along with the Directorate of Transport, Environment and Leisure Services will explore the potential for partnerships for delivering decentralised energy networks through Energy Service Companies (ESCo) and/or Multiple Utility Service Companies (MUSCo); 6. The Directorate of Planning and Borough Development will work with Thames Water to ensure that the timely implementation of the Thames Tideway Tunnel has a minimal impact on the Borough; 7. The Directorate of Planning and Borough Development together with the Directorate of Transport, Environment and Leisure Services will actively support Thames Water in the delivery of short-term mitigation against sewer flooding and will continue to support the planning and development of a long-term solution to reduce the risk of sewer flooding in the west of the Borough; Chapter 44 of the Core Strategy also sets out the relationship between the Core Strategy and the Community Strategy. Representations were taken into account and it is reflected in the 'Proposed Submission Core Strategy Consultation Report' (October 2009) and the 'Statement of Consultation Regulation 28(2)'. Moreover, the LDF Advisory Group, which included officers working in the Directorate of Planning and Borough Development, and the Directorate of Transport, Environment and Leisure Services and Councillors, has met regularly throughout the development of the Core Strategy making a key contribution to its production and approving the Core Strategy for examination. The Local Strategic Partnership are also committed to the implementation of the Core Strategy, particularly with regard to the delivery of social infrastructure and have not raised any substantive objection to its contents.
33. Does the development plan document take into account matters which may be imposed by circumstance, notwithstanding the council's views about the matter?	No such matters are anticipated in the Royal Borough. However, the Council has recently completed '*The Royal Borough 2028*' - a long term look at the future of the Borough. This has informed the development of the Core Strategy by developing views of 'probable,' 'possible' and 'preferred' futures of the Borough over the next 20 years. A key part of the Core Strategy is to set out contingencies for the future and to this end the 2028 project helps identify possible scenarios for what might happen which is outside the Council's control, including the preferred future that the Council wishes to see. However, the Core Strategy is considered flexible enough to deal with a change in circumstances, particularly with regard to specific items of infrastructure.
Flexible	

34. Is the development plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?	Yes, the plan includes alternative strategies that would handle any uncertainty about the delivery of the Core Strategy and what would trigger the need for these alternatives.

Chapter 39 of the Submission Core Strategy sets out the alternative strategies that were prepared to handle any uncertainty about the delivery of the Core Strategy and what would trigger the need for alternatives. This would provide flexibility to the Core Strategy allowing the identification of different delivery options in the event that housing delivery does not occur at the rate expected, as recommended in PPS3. Three scenarios were identified as follows:

Scenario 1 – There is a significant (more than 20%) shortfall in the actual delivery against the cumulative total. The Council will identify the reason for the shortfall and address any delivery constraint initially through considering amending policies on receipt of evidence and analysis, and encouraging land assembly. If this constraint cannot be overcome, the Council will return to the potential sites identified in the GLA SHLAA and Housing Capacity Study for assessment, and seek to identify further sites which would be suitable, available and achievable in light of changed circumstances.

Scenario 2 – There is a shortfall against the expected provision in a site or allocation. The Council will identify the reasons for this shortfall e.g. a delivery constraint or a false assumption made in the assessment. The Council will encourage land assembly, and consider amending policies on receipt of evidence and analysis, for example relaxing restrictions on office conversions to residential, if this is deemed appropriate from an employment perspective as well as a housing perspective. If the shortfall is significant, and will impact on delivery against cumulative total as in Scenario 1, the Council will seek to identify further sites, again from the SHLAA, which would be suitable.

Scenario 3 – Failure to deliver the level of anticipated development. The Council will seek to identify the reasons for the non-delivery and seek to eliminate any constraint, for example by identifying specific sites and encouraging land assembly. Amending policies, as in Scenarios 1 and 2 will be considered, if deemed appropriate, in addition to the Scenario 1 option of identifying further sites. If this is not possible, the Council will review the spatial distribution of future housing sites and may need to give housing greater emphasis relative to other uses and the anticipated growth in the broad location will be encouraged in other parts of the Borough.

Regarding infrastructure, the Council has worked and will continue to work closely with internal and external agencies responsible for delivering such infrastructure, to compile the Infrastructure Delivery Plan (IDP), which will be retained as a "live document". However, we acknowledge at paragraph 39.1.9 of the Core Strategy that there is a risk that infrastructure may not be provided. Contingency plans are therefore in place, where required which are laid out in the following Contingencies and Risks table in Chapter 39. The approach to a change in circumstances is outlined at paragraphs 39.1.9 and 39.1.10 of the Core Strategy. We have identified the proposed Crossrail station at Kensal as being the infrastructure project which has a high risk (although we are working hard to reduce this) and could possibly affect the quantum of development proposed if it does not come to fruition. On this basis we have recommended a lower quantum of development on the site and propose improved local accessibility through bus-based improvements. |
| 35. Is the development plan document | Yes, it is. The London Strategic Housing Land Availability Assessment and Housing Capacity Study(SHLAA) was produced by the GLA in conjunction with the London boroughs to provide a new London-wide housing target and new borough targets through a review of the London Plan. The annual monitoring target proposed for Kensington and Chelsea |

sufficiently flexible to deal with any changes to, for example, housing figures from an emerging regional special strategy?	is 585 new additional homes a year. From 2011/2012 the Council is planning to make provision for a minimum of 600 net additional dwellings per year (as stated in the housing trajectory, chapter 40 of the Core Strategy). This figure is consistent with the figures proposed by the SHLAA. The Housing Trajectory which stretches to 2028 shows that for overall delivery we will exceed our current housing target. However, to provide adequate material to satisfy the Inspector that the housing target can be met over the plan period we have prepared an additional supporting paper on windfall sites in the Borough which has been forwarded to PINS. Furthermore, chapter 39 of the Core Strategy identifies three different scenarios for housing delivery which have already been referred to at section 34.
36. Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing?	Yes, the Core Strategy has been prepared with The Royal Borough 2028, which is a project that looks at the long term future of the Borough, and which is built on a substantial evidence base, and that develops views of 'probable', 'possible' and 'preferred' futures for the Borough over the next 20years. The time horizons for the Core Strategy and The Royal Borough 2028 have been aligned so that the Core Strategy can be sensitive to the changes that will occur over the next 20 years. A key part of the Core Strategy is to set out contingencies for the future, which is included in Chapter 39. There is also a clear arrangement for monitoring and reporting results in Chapter 38 of the Core Strategy. The regular monitoring of the policies/strategies will allow the Council to take remedial actions in case they fail to deliver. A specific example of flexibility is the housing provision. The Borough has to provide a minimum of 3,500 homes between 2007/8 and 2016/7 - or 350 units a year. This housing target is set out in the London Plan. The Council is planning for 600 units a year to allow for some flexibility from 2011/12, the estimated date of adoption of the revised London Plan, for a 10 year period.
Monitoring	
37. Does the development plan document contain targets and milestones that relate to the delivery of the policies, including housing trajectories where the plan contains housing allocations?	The Core Strategy Chapter 40 in Section 3 Supporting Information contains the Housing trajectory and supporting information including affordable housing targets. These have been consulted on and changes proposed where necessary. The housing trajectory within the Core Strategy is based on that in the Annual Monitoring Report but has been extended to cover the full period of the strategy. The current Annual Monitoring Report deals with core national and local indicators showing performance over the year against objectives and targets in Part 3 pp21- 48. The housing trajectory in Part 3 and the five year housing supply in Appendix 7 provide background data and projections of housing supply and need. The 'Kensington and Chelsea Performance Report 2009' (http://teamareas/corporateservices/ppu/Service%20Improvement/KC%20Performance%20Report%202009.pdf) contains a wide range of national and local indicators with future milestones and targets as well as current performance trends.

38. Is it clear how these are to be measured and are these linked to the production of the annual monitoring report?	The Core Strategy Chapter 38 Monitoring includes core and local indicators from the latest annual monitoring report. A number of new indicators are introduced in the Core Strategy which will be monitored in future Annual Monitoring Reports (AMRs). Each Annual Monitoring Report assesses the performance of planning policies against current appropriate indicators and targets while anticipating future monitoring requirements. This is done in the current AMR at Part 2 and Part 3 (p 49). Kensington and Chelsea Performance Report 2009 and the additions and updates to the Community Strategy 2005-2015 are examples of reports containing information on the collection or measurement of indicators.
39. Are suitable targets and indicators present (by when, how and by whom)?	Chapter 38 Monitoring provides a detailed table of indicators and targets corresponding to the policies in the Core Strategy with timescales where appropriate. The Annual Monitoring Report Part 3, Monitoring Indicators contains an individual analysis by indicator in relation to the relevant policy objectives. Representations from the Government Office for London (GOL) in their letter dated 10 December 2009 stated: *"All policies included in the plan should be measurable and the plan must have clear arrangements for monitoring and reporting results to stakeholders. Chapter 38 sets out the monitoring framework for the Core Strategy and links to shorter sections on monitoring for each of the Places in Chapters 5-18. The monitoring framework appears to be a reasonable attempt to ensure that the objectives and policies of the plan are tracked. Numerical targets are included for some of the policies and reference is made to National Indicators and Core Output Indicators where appropriate, which is good practice. However, there are other indicators/targets that are less helpful and could be made more robust through the addition of numerical targets for example policies CA4(e), CA4(f), CA5(c) & CA5(d)."* In response to GOL's concern about a small number of monitoring indicators/targets, recommended changes have been made to make them more robust and the changes were contained in a letter to GOL dated 10 March 2010.

National policy	
40. Does the development plan document contain any policies or proposals that are not consistent with national planning policy? 41. If yes, is there a local justification?	The Council has taken account of national policy in formulating a Core Strategy approach with policies that reflect the specific circumstances of Kensington and Chelsea. On this basis we are confident that the Core Strategy is fully in line with national policy. The PPS4 definition of an edge-of-centre site (within 300 m of a town centre boundary) is not however, considered to be relevant in the Borough because almost the entirety of the Borough would qualify as edge-of-centre within this definition. The Council considers edge-of-centre development to be that adjacent to an existing centre (paragraph 31.3.3 of the Core Strategy). This takes local circumstances into account and is explained in the letter to GOL dated 10 March 2010.
42. Does the development plan document contain policies that do	The Council considers that all the policies in the Core Strategy are consistent with, yet do not merely repeat, National Policy. The Council has taken into account national guidance and the policies are considered to be tailored to meet the particular circumstances of the Royal Borough. Representations made by the Government Office for London on the Proposed Submission Core Strategy did not identify any such matters.

not add anything to existing national guidance? 43. If so, why have they been included?	