Combined SEA/SA Scoping and Screening Responses

February 2014
Dear James

SA Screening Opinion Consultation, Brompton Hospital, SPD

Thank you for consulting us on the draft SA screening opinion for the Royal Brompton Hospital site.

Based on a review of environmental constraints for which we are a statutory consultee, there are no areas of fluvial flood risk, Source Protection Zones for groundwater or watercourses affected by the area. Therefore we do not consider there to be potential significant environmental effects relating to these environmental constraints.

In your roles as Lead Local Flood Authorities we would recommend that you consider the Surface Water Management Plan for the proposed area.

If you have any further questions please contact me.

Yours sincerely

Mrs Wioleta Osior
Planning Advisor

Direct dial 0203 263 8053
Direct e-mail northlondonplanning@environment-agency.gov.uk
Dear Mr Reece

Thank you for the opportunity to comment on the Royal Borough of Kensington and Chelsea’s Draft Screening Statement for the Brompton Hospital SPD, which has been sent to English Heritage as one of the three consultation bodies set out in Stage 4 of the SEA Screening Procedure (for compliance with the SEA Directive and the 2004 Regulations). As the Government’s adviser on the historic environment, English Heritage is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of local planning.

English Heritage has reviewed the SPD Exhibition PDF providing information on the issues and options and considers that in this instance there may be significant environmental effects for the historic environment resulting from the SPD. As such, we consider that these trigger a need for an SEA to be prepared as part of the SPD’s plan making process. Additionally the proposed SPD may have impacts in respect of the scale and height of redevelopment not identified as part of the Core Strategy DPD.

Do not hesitate to contact me if you have any queries or require further clarification in respect of this advice.

Best regards

Richard Parish
Historic Places Adviser
Direct line 020 7973 3717
Fax 020 7973 3792

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www.english-heritage.org.uk
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http://www.english-heritage.org.uk/professional/archives-and-collections/portico/
Dear Mr. Preece,

Planning consultation: SEA Screening Opinion Consultation Brompton Hospital Supplementary Planning Document (SPD).

Location: Royal Borough of Kensington and Chelsea.

Thank you for your consultation on the above dated 13 November 2013.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Strategic Environmental Assessment (SEA):
Given the locations of the sites involved in the consultation and the fact they all fall within a heavily built-up area there wouldn’t be any issues from Natural England’s point of view with the conclusions drawn by the document as submitted. The sites themselves don’t fall within or near to any designated sites that would require further assessment in this instance so the only thing that could be mentioned is the fact that the sites do fall within an area of deprivation as defined by the Greater London Authority (GLA).

It would be good to see, as part of any phased future redevelopment, an increase in open space if any is possible and certainly for any existing spaces to be kept and if possible improved rather than losing what little there is. An alternative option to increasing open space would be to consider the use of green roofs or living walls as part of the new design in order to incorporate Green Infrastructure (GI) into the area.

Given that the SPD is being drawn up in order to provide site specific design and planning guidance for future development of the Hospital it would be nice to see that it ties in with various paragraphs from the National Planning and Policy Framework (NPPF) such as 118 and 114 for instance.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely,

Piotr Behnke
Development Plan Network – Land Use Ops
Piotr.behnke@naturalengland.org.uk
0300 060 1963
Dear James

Scoping Report for the Royal Brompton Hospital Local Development Framework (LDF).

Thank you for consulting us on the Scoping Report for the Royal Brompton Hospital site.

We are a statutory consultee in the Strategic Environmental Assessment (SEA) process and aim to reduce flood risk and protect and enhance the water environment. However as there are no environmental constraints under our remit (such as fluvial/tidal flood risk, watercourses) that could affect the proposed designated area, we have no detailed comments to make in relation to your scoping report.

In your roles as Lead Local Flood Authorities we would recommend that you consider the Surface Water Management Plans for the proposed area.

If you would like to discuss anything further please contact me on the details below.

Yours sincerely

Mrs Wioleta Osior
Planning Advisor

Direct dial 0203 263 8053
Direct e-mail northlondonplanning@environment-agency.gov.uk
Mr James Masini
Royal Borough of Kensington and Chelsea
By email: James.Masini@rbkc.gov.uk

17 February 2014

Dear Mr Masini

**Royal Brompton Hospital Supplementary Planning Document SA/SEA Report Addendum**

Thank you for your consultation of 11 February 2014 seeking a scoping opinion for the above site. As the Government’s adviser on all matters pertaining to the historic environment and a consultation body for the purposes of Regulation 10(4) of the Town and Country (Environmental Impact Assessment) (England and Wales) Regulations 1999 (“the EIA Regulations”), English Heritage writes to inform the Royal Borough of Kensington and Chelsea’s Scoping Opinion on the Environmental Statement for the above site.

On the basis of the information provided, detailed below, it appears that the plan is likely to lead to a planning application (affecting the setting of designated heritage assets as set out in Circular 01/01) for which English Heritage would be a statutory consultee.

Of greatest relevance to English Heritage is SA Objective 16, which sets out the intention “To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage”.

To help inform the baseline and assessment methodologies set out in the pre-application consultation, we would advise the applicants consider consulting the London Heritage Environment Record, and the relevant conservation area appraisals. These documents should be used, not only to establish significant and sensitive features/views affected by the proposals, but to help establish the significance and sensitivities of the affected assets. English Heritage’s Guidance: The Setting of Heritage Assets sets out best practice and guidance on evaluating the setting and significance of heritage assets. In addition, the joint English Heritage/Cabe Guidance on Tall Buildings (2007) sets out best practice and advice in relation to tall buildings and planning policy, if appropriate.
We would also recommend that the guidance set out in the still current Guidance to PPS5 and Draft Guidance for the NPPF should inform the sensitivity and impact of the proposals in relation to heritage assets.

A copy of the consultation should be sent to the Greater London Archaeology Advisory Service for consideration of whether this sets out adequate provision for assessing the impacts on archaeological assets.

Please contact me if you would like to discuss any of the above matters further.

Yours sincerely

Richard Parish
Historic Places Adviser
E-mail: richard.parish@english-heritage.org.uk
Dear Mr Masini,

Planning consultation: Royal Brompton Hospital Scoping LDF SA / SEA Scoping Report Addendum ( SPD)  
Location: Kensington and Chelsea

Thank you for your consultation on the above dated 11 February 2014

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Sustainability Appraisal ( SA) & Strategic Environmental Assessment (SEA) Scoping: 
Having checked through the SA scoping document it is clear that a good range of objectives that will be covered in the Appraisal. Natural England would however like to see more emphasis placed on objective 1 which should still considered as part of any new redevelopment in the area. Given the links that objective 8 has with biodiversity and the natural environment it should be seen as vital to link this with objective 1.

It is good to see the objectives that will look at how well the Brompton Hospital redevelopment will cope with helping to reduce air, water and land pollution and also to help reduce the effects on climate change that the SPD might have. Section A3 makes mention of taking issues around open space into account for the redevelopment which is welcomed. Otherwise the objectives that are provided should provide a good test of how well the policies will cope with the various aspects covered.

Natural England will look forward to being consulted in due course on the final Royal Brompton Hospital Supplementary Planning Document and SA / SEA.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Piotr Behnke on 0300 060 1963. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely