

THE ROYAL
BOROUGH OF

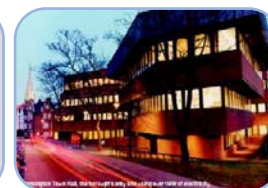


KENSINGTON
AND CHELSEA



SCOTT WILSON Planning Environment and Design
Strategic Environmental Assessment / Sustainability
Appraisal of Royal Borough of Kensington and Chelsea
Local Development Framework – Core Strategy

INTERIM SUSTAINABILITY APPRAISAL REPORT



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Chelsea Local Development Framework – Core
Strategy

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TABLE OF CONTENTS

1	Background	2
1.1	Introduction	2
1.2	SEA / SA	2
1.3	This Report	5
2	Testing the Plan Objectives	6
2.2	B1 Findings.....	8
3	Assessing the Options	10
4	Conclusions.....	37
	Appendices	42

1 BACKGROUND

1.1 Introduction

1.1.1 Scott Wilson have been commissioned by the Royal Borough of Kensington and Chelsea ('the Council') to undertake the Strategic Environmental Assessment (SEA) / Sustainability Appraisal (SA) of their Local Development Framework (LDF). The scope of this work is to complete a full SA of the following component parts of the Council's LDF, the Development Plan Documents for:

- The Core Strategy;
- Development Control policies (Generic); and
- The Site Specific Allocations.

1.1.2 Additional appraisal of a number of Supplementary Planning Documents (SPDs) will also be carried out at a later stage by Scott Wilson on behalf of the Council. These include the SPDs for Designing Out Crime, Access Design Guide, Brompton Hospital Planning Brief and Princes Louise Hospital Planning Brief.

1.2 SEA / SA

1.2.1 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 LDFs. LDFs replace the current local hierarchy of development plans (Unitary Development Plans, and Local Plans).

1.2.2 Under the Planning and Compulsory Purchase Act 2004 (PCPA), Local Authorities must undertake SA for each of their DPDs and SPDs – the constituent parts of the LDF. SA is therefore a statutory requirement for LDFs along with SEA.

1.2.3 The Government's approach is to incorporate the requirements of the SEA Directive into a wider SA process that considers economic and social as well as environmental effects. To this end, in September 2004, the Government published draft guidance – which the Consultants are following - on undertaking SA of LDFs which incorporates the requirements of the SEA Directive¹ ('the Guidance'). The combined SEA / SA process is referred to in this document as 'Sustainability Appraisal (SA)'.

1.2.4 The Guidance (in this case revised in light of Interim Advice²) advocates a five-stage approach to undertaking SA (see Figure 1). According to the Guidance, the

¹ ODPM (2004). *Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks – Consultation Paper*.

² ODPM (2005) *Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks – Interim Advice on Frequently asked questions*. ODPM

Scoping Report should set out the findings of Stage A together with information on what happens next in the process.

- 1.2.5 The SEA Directive sets out a legal assessment process that must be followed. In light of this, the Scoping Report clearly sets out the relevant requirements of the SEA Directive and explains how these have been satisfied (or will be satisfied). 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 several of the required components of the Environmental Report.
- 1.2.6 This process therefore aims to satisfy the requirements of the SEA Directive and those of Government guidance. More specifically the process aims:
- To promote sustainable development
 - To provide for a high level of protection for the environment;
 - To integrate sustainability and environmental considerations into the preparation of plans and programmes;
 - To take a long term view of whether and how the area covered by the plan is expected to develop, taking account of the social, environmental and economic effects of the proposed plan;
 - To provide a mechanism for ensuring that sustainability objectives are translated into sustainable planning policies;
 - To reflect global, national, regional and local concerns;
 - To provide an audit trail of how the plan has been revised to take into account the findings of the SA; and
 - To form an integral part of all stages of the plan preparation.
- 1.2.7 Table 1 overleaf indicates where specific requirements of the SEA Directive can be found. This report is one of several key reports to be prepared as part of the SEA / SA process and the table records in which reports information can be found.

Table 1: SEA Directive requirements checklist

Environmental Report requirements ³	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;	<i>Scoping Report Chapter 2</i>
(b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	<i>Scoping Report Chapter 3</i>
(c) The environmental characteristics of areas likely to be significantly affected;	<i>Scoping Report Chapter 3</i>
(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);	<i>Scoping Report Chapter 4</i>
(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;	<i>Scoping Report Chapter 2 and 5</i>
(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;	<i>Interim SA Report Section 3 and SA Report</i>
(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;	<i>Interim SA Report Section 3 and SA Report</i>
(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;	<i>To follow in SA Report</i>
(i) A description of the measures envisaged concerning monitoring in accordance with Article 10;	<i>To follow in SA Report</i>
(j) A non-technical summary of the information provided under the above headings.	<i>Included in ISAR (Front matter) and will be included in SA Report</i>

³ 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)

1.3 This Report

1.3.1 The requirement for the assessment of the options comes from the SEA Directive:

“an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated”

(Article 5.1)

1.3.2 Stage B of the SA process involves the main body of appraisal work. A key component of this is the appraisal of the Core Strategy objectives (which will determine the direction of spatial policy in the Borough) and the various spatial options, the choice of which will provide the foundations for the Core Strategy DPD and the Site Specific Allocations DPD (at a later date).

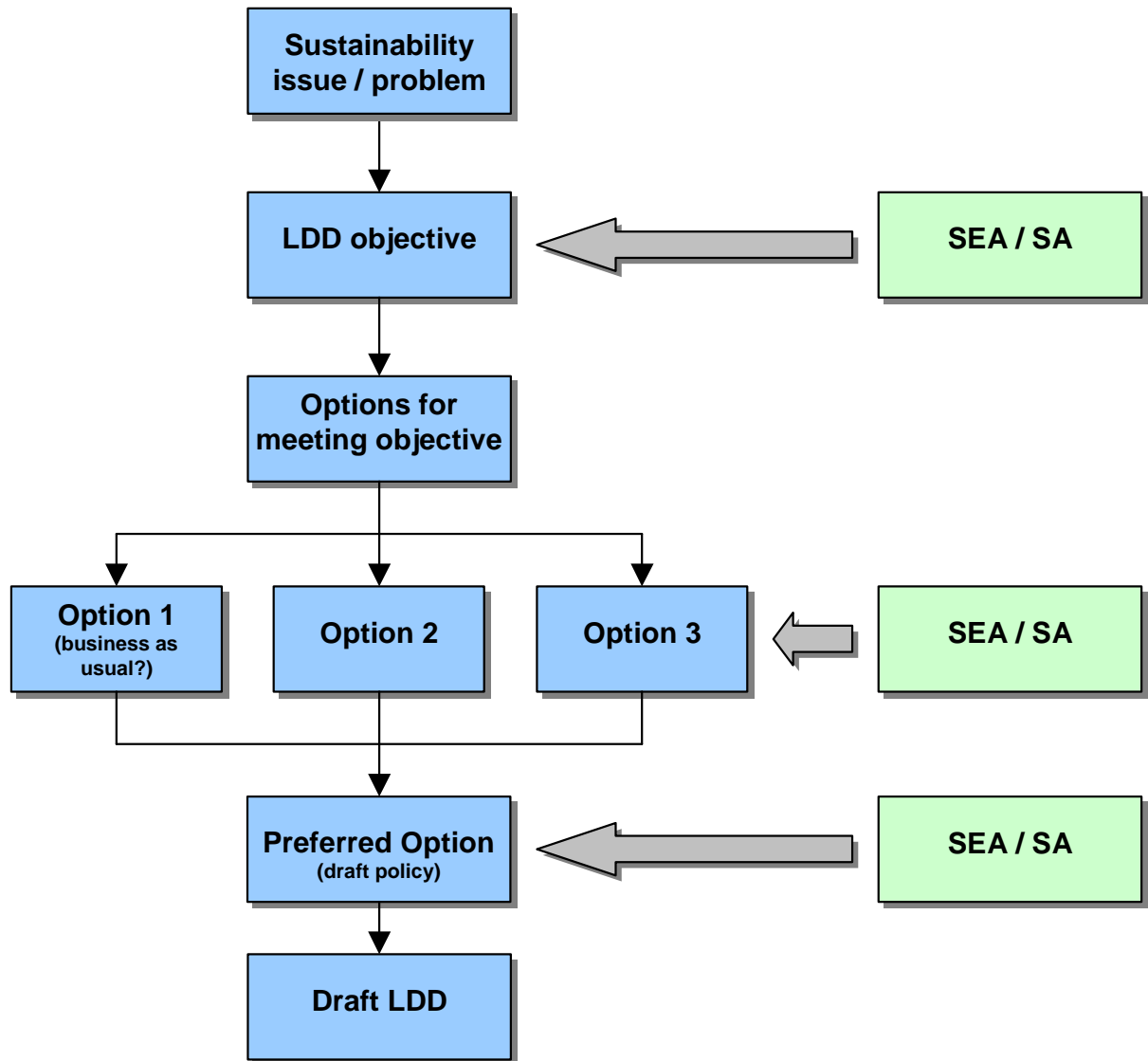
1.3.3 This report – referred to as an Interim Sustainability Appraisal Report (ISAR) – documents the appraisal of the Core Strategy objectives and the various options identified by the Council and summarises their potential economic, social and environmental implications. This report – although not a formal requirement – has been prepared to help demonstrate that sustainability considerations have been incorporated into the development of the Core Strategy and Development Land Allocations DPDs from an early stage, and to provide information for stakeholders as well as an audit trail of the appraisal process. The appraisal findings documented in this report should be taken into account in the development and choice of the preferred options that will provide the basis for the two DPDs. This report should be read alongside:

- RBKC Issues and Options Report
- RBKC LDF SA / SEA Scoping Report (Vols I, II & III)

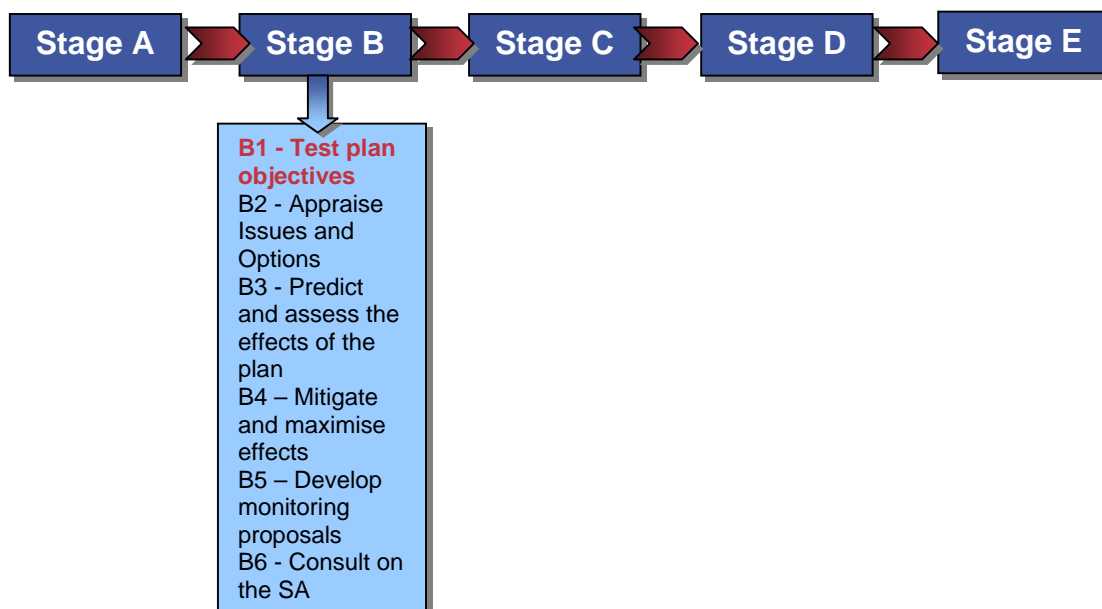
1.3.4 Following the choice of preferred options, a further appraisal will be undertaken of these and the findings will be documented in a Final SA Report. The latter will be published for consultation alongside the report on the preferred options (as required by Regulation 26 of the Town and Country Planning (Local Development) Regulations, 2004). Figure 1 illustrates the relationship between issues, objectives and options, and the points at which SA is undertaken.

1.3.5 The SEA Directive sets out a legal assessment process that must be followed. In light of this, this report clearly sets out the relevant requirements of the SEA Directive and explains how these have been satisfied (or will be satisfied). In particular, the SEA Directive requires that ‘reasonable alternatives’ are identified, described and evaluated taking into account ‘the objectives and the geographical scope of the plan or programme’.

Figure 1. The application of SEA / SA in the preparation of a LDD



2 TESTING THE PLAN OBJECTIVES



2.1.1 The emerging LDF for RBKC sets out a series of objectives against which planning policies, land allocation and general development control policies will be established. These objectives have been assessed against the broader sustainability objectives that will be used to appraise the LDF, as outlined previously. Stage B1 in the Interim Sustainability Assessment Report highlights synergies and conflicts between the LDF and SA Objectives. The LDF Objectives are shown below:

1. To preserve and enhance the residential and historic character of the Borough and its amenities to ensure a high quality of life for all its residents;
2. To preserve or enhance the historic environment and to ensure that all new development reflects the special character and appearance of the local area through high quality design and materials, layout and landscaping;
3. To seek to improve the Borough's streetscape, with more public art and more street improvement schemes (of the kind that have transformed Kensington High Street into the most talked about streetscape in the Capital);
4. To provide a range of housing which meets the wide needs of the community, including affordable housing;
5. To secure the amenities necessary to provide a better city life for the whole community – health, education, leisure and recreation, arts and culture and local services and shops;
6. To protect and enhance the quality, attractiveness, vitality and viability of the Borough's shopping centres and local shopping centres;
7. To support and encourage economic growth in the Borough and to maintain a diversity of job opportunities for the benefit of local residents;

8. To protect the Borough's trees, parks and open spaces and to ensure that they are well managed and attractive;
9. To minimise the impact that our community has on the environment through the facilitation and encouragement of recycling, waste minimisation and energy efficient construction;
10. To seek and encourage sustainable approaches to the maintenance and enhancement of buildings and the environment, including the improvement of air quality;
11. To ensure an appropriate balance between the Borough's contribution to London as a 'World City' and its role as a place which people call home;
12. To enhance public transport and to encourage cycling and walking as attractive forms of travel;
13. To seek new housing with neither parking attached nor a right to a residents parking permit;
14. To concentrate land uses in appropriate locations to reduce the need to travel, especially high trip generating development which should be in areas well served by public transport and accessible by foot and by cycle; and
15. To allow everyone who lives, works or visits the Borough to benefit from its reputation for public safety.

2.2 B1 Findings

2.2.1 The assessment indicated that there were no definite conflicts between the LDF Objectives and the SA / SEA Objectives and in fact there were synergies between them. However, in some areas there were ambiguities that would be in conflict, depending on the way in which the plan is implemented and other development control mechanisms. Table 2 below outlines the key comments on the assessment and the full matrix can be found in Appendix I of this report. Broadly speaking the Objectives of the LDF are balance and compatible in sustainability terms.

Table 2. Comments from the Objective Assessment

1. A higher quality of life for all is compatible with SA Objective 4 inclusion of equity and equality
2. Dependant on how housing need is accommodated
3. Embodied energy and general energy efficiency of new materials can help to lower the energy costs of streetscape without detriment to visual amenity and character.
4. RBKC is a very affluent borough, with high property prices and design / architectural standards, thus new development, if in keeping may exclude the economically disadvantaged
5. Dependant on design criteria of new development
6. As in Objective 5, dependant on the definition of "high quality design materials" as one may be exclusive of the other.
7. Dependent on how the housing needs are met.
8. Dependent on implementation and type of "high quality design".
9. Streetscape can reduce the accessibility of cars and encourage the use of alternatives such as cyclists.
10. Streetscape can include the provision of waste disposal facilities, including those for recycling.
11. Embodied energy and general energy efficiency of new materials can help to lower the energy

costs of streetscape.

12. Dependent on the form of provision, however, given the boroughs density and scarcity of open space, this may be a positive correlation.

13. More accommodation may result in increased population with increased demands on the natural capital in the borough and an increased possibility of minor pollution events.

14. As for Objective 8.

15. If increased provision of housing results in increased population then there will be increased waste. However, if waste minimisation measures are built in then this may reduce the waste per capita produced by new development.

16. Dependent on the implementation / design of these services and facilities.

17. There is an argument here regarding the provision of services and facilities, namely shopping and retail that may induce more traffic into the borough if not located in areas well served by public transport.

18. Increased visitors to new services and facilities may result in increased waste generation.

19. Attractiveness and quality can be analogous to providing open space and parks.

20. Retain front gardens, maintaining biodiversity?

21. Fewer vehicles on the street should discourage thefts from and of vehicles.

22. May encourage car users to not use cars, lowering emissions to air.

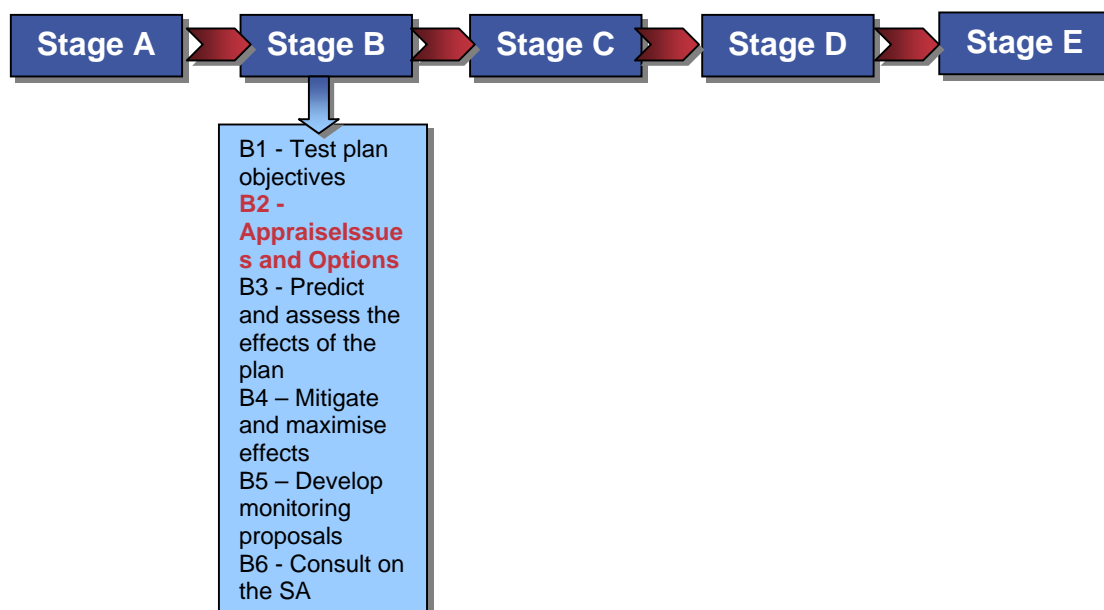
23. May discourage car users and encourage them onto public transport.

24. Are "appropriate locations" considering deprivation in addition to trip generation? Appropriate locations should not be a relationship of transport generation only, but should also consider whether needs and possible areas of deprivation in deriving their appropriateness.

25. Again "appropriate location" definition.

26. Land uses including health provision.

3 ASSESSING THE OPTIONS



- 3.1.1 The Options were tested using methodology outlined in the ODPM's Guidance⁴, and contained in full in Appendix II of this report. The SA Framework, supplemented by data from the Scoping Report including GIS were used to inform the assessment. Additionally, the assessment was conducted in conjunction with RBKC.
- 3.1.2 The Core Strategy DPD has been assessed against the 16 SEA / SA objectives and 1 sub Objective defined in the Scoping Report prepared by Scott Wilson and RBKC with each objective to measure the effectiveness of each option in sustainability terms. Taken as a whole, the Core Strategy DPD performs well against the chosen objectives. Clearly each option is intended to achieve specific ends and an option intended to promote economic growth is likely to have negative impacts against, for instance, emissions of greenhouse gases. Viewed in isolation individual options may not seem particularly sustainable, however development in the Borough will be governed by all policies in the DPD and in those terms the options may be regarded as meeting the sustainability criteria.
- 3.1.3 Nevertheless the assessment has identified certain areas where the options could be improved, these are outlined in the Conclusions section of this report.
- 3.1.4 Certain gaps have been identified in the coverage of the DPD against the sustainability objectives. These are also identified in the Conclusions section of this report.
- 3.1.5 The table below summarises the assessment of all the options in the Core Strategy DPD Issues and Options Report.

⁴ ODPM (2005) *Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks*. ODPM

- 3.1.6 Bold text is used to identify those options which are assessed as unsustainable, or where a significant change in wording and therefore focus is needed. Options which cannot be assessed because they address procedures are shown in italics.
- 3.1.7 In this instance, the report **does not** distinguish between Preferred, Alternative and Rejected as the Options are in the early stages of development. The SA Report, which will follow this assessment, will include these criteria in relation to the Options assessed herein.

Table 3 – Assessment Summaries

Conservation and Development	
Issue 2: The Borough's Heritage and Environmental Quality	<p>Summary: There seems to be no clear distinction between 2 & 3 as they cancel each other out in most areas, therefore, a way forward as highlighted in Option 1 of sensitive location of development seems the most sustainable.</p> <p>Mitigation / Recommendations: In light of biodiversity losses, a hierarchical approach could be adopted whereby any development that has any level of adverse environmental effects, in particular on nature conservation, is the last choice location for new development. However, this will need to be balanced against the social and economic requirements of particular sites. Therefore, the location of development should be judged not only against the environmental hierarchy but also the social and economic.</p>
Issue 3: Large scale, landmark buildings	<p>Summary: Whilst the London Plan advocates the use of "tall buildings", in many cases the nature of the Borough may prohibit the use of this design due to existing constraints. In the case of RBKC, the nature of the Borough and the coverage of conservation areas severely constrains the areas where tall buildings can be located without detrimental effect to the designated area. Therefore, areas <i>outside the conservation areas</i> should be identified where tall buildings will be appropriate. Option 1, 3 and 4 combined would seem the most sustainable way forward, resist tall buildings where in appropriate but also identify areas in the Borough that will not be adversely affected by tall buildings. Where these are appropriate, they should be considered on a case – by – case basis.</p> <p>Mitigation / Recommendations: Policy needs to consider the design of the tall buildings in order to ensure that the conservation area's surrounds to not adversely effect the character of the area.</p>
Issue 4: Loss of front gardens	<p>Reduction of off street parking and on street parking will put total pressure on all car parking. The preservation of the Borough's front gardens will contribute to the preservation of cultural heritage and biodiversity of the Borough. Furthermore, the provision of parking places underpins congestion and car use in the Borough. By removing or preventing the storage of vehicles, this can be alleviated and will further encourage the use of public transport. This may further benefit public safety. Option 1 is clearly the more sustainable option for this issue.</p> <p>Mitigation / Recommendations: Policy should include strong wording resisting the conversion of front gardens into parking facilities (unless under exceptional circumstances such as disability access)</p>

<p>Issue 5 - Telecommunication equipment</p>	<p>Summary: Telecommunications equipment should be located where it is least likely to have a detrimental impact on conservation areas and listed buildings. The nature of the Borough is such that this impact may have more significance than elsewhere in London thus Option 2, the general resistance of telecommunication equipment in conservation areas an on or in the curtilage of listed buildings would seem preferable, however, this should be tempered somewhat dependant on the economic need of establishing such equipment, and the sensitivity of the design.</p> <p>Mitigation / Recommendations: Strongly worded policy regarding the location of mobile masts, however, there should be design requirements that would help masts blend in with the area in case they are required in conservation areas or near listed buildings.</p>
<p>Issue 6: Subterranean Development</p>	<p>Summary: Option 1 ensures no potential adverse impacts on structural stability, water table, planting, though potentially restricts the economy's growth. Option 2 may enable controlled growth of the economy and extensions of homes whilst potentially maintaining local distinctiveness, however there may be impacts on structural stability, planting and the water table. Option 3 provides the same impacts, however without the control provided by option 2. Therefore, Option 2 is regarded as the most sustainable, however, the specific criteria outlined in the option should address the negative sustainability issues highlighted in the assessment above.</p> <p>Mitigation / Recommendations: a policy should enable further growth of the economy and residences, where appropriate, though criteria should be considered/satisfied, including assessment of potential impacts on structural stability, water table and planting.</p>
<p>Issue 7: Extensions to residential properties</p>	<p>Summary: Option 1 may not enable some families to stay within the Borough, causing adverse effects on the economy and social inclusion, whilst maintaining local distinctiveness. Option 2 enables some extensions whilst maintaining distinctiveness, though the number of extensions could be severely restricted by other policies, therefore potentially not reducing leakage of families. Option 3 maintains appearance of the Borough, through potentially not the attractiveness, and may provide economic, social and housing benefits to the residents. Option 4 is adverse to local distinctiveness and does not enable any control on the extensions, however it may be beneficial to residents needs and the economy, allowing families to stay in the Borough. However, in a densely populated Borough such as Kensington and Chelsea the impact of extensions upon the neighbouring properties in terms of daylight, and enclosure is seen or particular significance. A compromise between flexibility of design and minimising detrimental impacts on amenity should be sought.</p> <p>Mitigation / Recommendations: a policy should enable families to stay within the Borough, preventing leakage from the economy, providing social inclusion and meeting their needs. Creating more flexibility in the policies including those in terms of residential daylight/ overlooking policies to enable extensions is required, though control is needed.</p>

Housing

Issue 8: Protecting the existing housing stock

Summary: A significant proportion of the housing requirements of the Borough will be created through the change of use of existing buildings or the reconfiguration of the internal layout of existing residential buildings to accommodate different tenure types. However, the provision of homes through demolition & rebuild is more significant. Options 1 and 3 exclude sections of the community from the provision of housing. So does Option 2, however benefits are provided in provision of essentially accessible healthcare/ community facilities. Option 4 reduces the supply of housing to economical workers, however is beneficial in the provision of affordable housing, though higher income families are potentially excluded. Option 5 whilst providing for families may do this at the expense of single person households. Any preferred Option will need to cater for the Borough’s demand for small units, therefore a mix of Option 1 and 2, would be the preferred sustainability option.

Mitigation / Recommendations: A policy promoting the balance of provision for small households, affordable household requirements and family households should take account of/require a Local Housing Needs Survey and the current and future proportions of household types within the Borough

Issue 9a: Housing provision and location

Summary: some of the location of new residential development is largely going to be down to the rearrangement of the internals of some existing buildings, in light of these options, development that does not fit into this should be in areas where there is existing *infrastructure* both services facilities and health but also economic opportunities. The development will also be on brownfield land, in line with government Sustainability targets and aspirations and nature of the Borough. Due to the nature of the Borough, all development will be on previously developed land, other than being weary of the biodiversity value of some brownfield sites, the Option should aim to create new dwellings in areas of deprivation, Option 5 offers the flexibility of placing homes where there is need whilst meeting the requirements for development on previously developed land.

Mitigation / Recommendations: A clear option should be created, integrating the above comments, linking residents needs, current capacity and the requirement to build on brownfield sites.

<p>Issue 9b: Housing provision and location</p>	<p>Summary: Option 1 has the adverse impacts of spreading the risk of flooding, pollution, potentially increasing the need for transport and not meeting the needs of the residents. Option 2 potentially lessens the aerial extent of development and therefore flooding risk, pollution, impacts on biodiversity (through smaller footprints), adverse effects may be the higher concentration of pollution sources, including vehicles. Option 3 may result in greater aerial extent of developments, despite smaller dwellings, therefore potentially increasing extent of pollution, biodiversity, need for transport. Option 3 potentially only provides for small households. Option 4 may be beneficial in terms of prioritising PDL and potentially providing for residents housing needs, however potentially reducing economic activities and policy protected open spaces and biodiversity sites may be at risk. Therefore, considering the Borough's housing requirements (i.e. for small flats) an Option that provides for that would be preferable (also considering this could be done through internal configurations) leading to Option 5 being preferred, however, where existing policy dictates, change of use should be considered on a case – by – case basis.</p> <p>Mitigation / recommendations: the above comments should be taken account of when considering the suitability of housing types. Policies should be flexible, where appropriate. Policy should make provision for provision for the larger section of small households as well as the need for family housing. Policy should prevent spread onto designated sites (including open spaces and parks). Where higher densities are utilised adequate infrastructure (including public transport, doctors, etc) should be put in place.</p>
<p>Issue 10a: Local needs housing.</p>	<p>Summary: providing housing available to all allows competition from non-residents, which although is beneficial in economic terms has the potential for low wage earners to not be able to purchase. Providing public housing for those eligible potentially does not take account of high income earners need for housing. Restricting new dwelling availability to local residents enables a local, widely skilled workforce and should maintain monies within the local economy, though competition and diversity may be restricted. The valuable parks, open space and SNCIs are at risk from development pressures unless the environment is preserved. This and achieving high standards of design to assist in achieving sustainable development. Option 4 seems the most sustainable, balancing the provision of housing for the needs of the Borough, with the preservation of the environment and the implicit preservation of the character of the Borough through the high standards of design.</p> <p>Mitigation / Recommendations: take account of the above in the development of policy. A mixture of public and private housing, taking account of the environment, promoting high design standards, is beneficial, where local needs MUST be taken account of.</p>

<p>Issue 10b: Local needs housing.</p>	<p>Summary: Requiring a residential qualification meets the Borough's local housing needs though there may be a lack of community diversity in the longer term, monies are expected to circulate within the local economy. Requiring a minimum number of years spent in the Borough excludes a proportion of current residents. Requiring family connections is likely to result in an influx of persons from outside the Borough, as may requiring business connections. Though locating the workforce close to employment has beneficial impact on transport and associated air quality/climate change, this may result in a lack of diversity within the community due to the high retail sector of the Borough. Greater clarification will be required on the residential qualification of Option 1, although at this stage this would seem the more appropriate policy, allowing free movement of work force and some method of determining housing need within the Borough.</p> <p>Mitigation / Recommendations: take account of the above in the development of policy. Requirements for residential qualifications and business connections are the most beneficial in term of sustainable 'local needs housing'.</p>
<p>Issue 11: Housing Density</p>	<p>Summary: it is apparent that provision of high density housing enables a greater amount of the Borough's housing needs to be met. Where options have provided for high-density housing, social and environmental aspects are important in achieving sustainability. High-quality design is important in this respect, for example in designing out crime and taking account of transport issues. The use of previously developed land should also be considered important where appropriate. The location of development outside conservation areas may not allow sufficient supply of land for development given to the significant size of the conservation areas in the Borough. Placing further high-density housing near existing high-density centres needs to ensure infrastructure and services capacity is available. Placing housing on public transport links, as well as near retail centres is beneficial in transport and air pollution terms. 1, 7 and 8 have the more sustainable qualities however, one by one they may not be as sustainable as the 3 combined, resulting in the possible creation of developments that are of a high quality design, sensitive to the conservation of the Borough, located in areas of existing high density and well served by public transport.</p> <p>Mitigation / Recommendations: take account of the above in the development of policy. Policy should promote high-quality design reflecting the character of the local area, assist in accessibility to public transport and community services and facilities. Providing a controlled approach to high-density housing in Conservation Areas.</p>

<p>Issue 12: Estate Renewal</p>	<p>Summary: renewal of existing housing estates is sustainable in terms of both increasing energy efficiency / resource use and the use of previously developed land. Encouraging mixed and balanced communities with mixed tenures creates a diverse community reducing social exclusion. Ensuring no net loss of affordable housing the sustainable and terms of supplying low-income households and still potentially providing for higher income earners. Increasing densities on site is sustainable where design quality is high and space-efficient. Utilising market housing to fund renewal is beneficial to the local economy. Open spaces should be maintained/provided within the renewal. Option 1 encourages the creation of communities of mixed tenure, which would allow for greater social and economic benefits providing there is adequate provision of affordable housing. This option should be allied to Option 3 to include high quality design.</p> <p>Mitigation / Recommendations: take account of the above in the development of policy. A mix of Options 1 and 3 would be most beneficial to sustainability.</p>
<p>Issue 13a: Housing mix</p>	<p>Summary: Option 1 would appear to be the sustainable option as it encourages social inclusion, its impact on air, pollution, traffic levels and climate change are dependent on parking provisions. Increasing the number of residents may result in an increase in use of community services and facilities. If land take is required there is potential for use of previously developed land, however there is also a risk to capacity of open spaces and parks. Option 2 may result in an increase in youth crime, have adverse effects on climate change, air and pollution if multi-car households enter the Borough (this should be enforced), new developments and increases in households may have greater adverse impacts on the open spaces and parks. The potential for use of previously developed land is beneficial, though there will be a need for provision of community services and facilities. Option 3 may cause disparities in social inclusion, neglecting smaller schemes. Option 4 has the potential for concentration on high-density flat accommodation, potentially increasing adverse impact on traffic, air, pollution and climate change through vehicle increases. As with the other Options, Options 3 and 4 have the potential for adverse pressure on open space and parks and beneficial use of previously developed land, and the need for provision of community facilities and services.</p> <p>Mitigation / Recommendations: take account of the above in the development of policy, including taking account of parking provision, protection/enhancement of open space and parks, and community facilities and services to reduce the impacts of additional pressures. It is considered that market decision making should not be allowed without some sort of guide, for example on affordable housing by the local authority.</p>
<p>Issue 13b: Housing mix</p>	<p>Summary: this is not a list of options which are possible to appraise because they are in the form of a questionnaire and therefore would be dependent on respondents opinions.</p>

<p>Issue 14a: Affordable Housing Proportions</p>	<p>Summary: increasing requirement for affordable housing is beneficial in terms of allowing greater diversity and inclusion of the community and meeting more of the needs of those eligible to affordable housing. Amount of affordable housing based on assessment of local needs allows greater flexibility in approaches as does adopting higher proportions on site. Option 3 seems the clearest option in regard to this issue.</p> <p>Mitigation / Recommendations: Policy should take account of local needs across the Borough, enabling greater proportions of affordable housing where appropriate.</p>
<p>Issue 14b: Affordable Housing Threshold</p>	<p>Summary: Requiring numbers of affordable housing on smaller sites result in the potential for accommodating more households eligible for affordable housing within a greater number of smaller new neighbourhoods. There may be potential for smaller sites being uneconomical if a proportion of affordable housing is required. Removing thresholds and assessing developments on their own merits has potential for provision of high numbers of affordable housing, however there is potentially scope for developers to influence the number of market housing unless criteria is rigid. Removing thresholds and use of floor space, instead of numbers of houses, as a threshold enables a specificity in allocating size of affordable housing floor space in relation to standards for living accommodation, where potentially more affordable floor space can be provided if controlled by such standards. No option could be determined as the more sustainable at this stage for this issue.</p> <p>Mitigation / Recommendations: take account of the above in the development of policy. Enabling affordable development on smaller sites is beneficial, where economically viable. If found to be uneconomical developments may be assessed against sustainability criteria. Where apartments/ flats are developed a threshold in terms of floor space should be considered. Recommend monitoring delivery and changing thresholds if they prove un-economic.</p>
<p>Issue 14c: Affordable Housing and Commercial Developments</p>	<p>Summary: providing for affordable housing in residential developments is beneficial though the scope for such housing is limited. Seeking affordable housing from commercial developments as mixed use developments has the potential for enabling greater social inclusion, diversity, access to services and facilities within communities; as well as greater opportunities for locating affordable housing within the Borough. Requiring large commercial developments to provide key worker housing provides a benefit to these workers and therefore the community at large. Option 1 should be extended to cover mixed-use development provision of affordable housing, thus combining Options 1 and 2.</p> <p>Mitigation / Recommendations: policy should seek mixed-use schemes with affordable housing, and where appropriate key worker housing.</p>
<p>Issue 14d: Affordable Housing: Intermediate and Social Housing Proportions</p>	<p>Summary: Not specifically requiring the intermediate housing means the Boroughs housing needs are not met and has the potential to create adverse effects on community diversity/inclusion and the local economy. Option 2 and 3 allow for a greater cross-section of housing need to be met and for a greater cross-section within the community and economy, with Option 3 specifically meeting the Borough's needs. However, where there is not local needs information to inform a decision, the London Plan's 70 / 30 split should be adopted.</p>

	<p>Mitigation / Recommendations: the policy should take account of the above. Policy should meet current and future local needs, potentially identified through a Local Housing Need Survey.</p>
<p>Issue 14e: Affordable housing location</p>	<p>Summary: enabling affordable housing on development sites is beneficial in terms of local economics and mixed communities, providing housing as in Option 2 allows greater diversity in regard to the location of affordable housing and the possible location of affordable housing in areas of most need throughout the Borough.</p> <p>Mitigation / Recommendations: policy should seek affordable housing within the central and southern parts of the Borough particularly on development sites.</p>
<p>Issue 15: Houses in Multiple Occupation</p>	<p>Summary: protecting non self-contained bedsits is key in the provision of housing for low-income earners and maintaining them within the economy. A requirement for adhering to space standards should be important in maintaining/improving standards of living. A balance of communities should ensure no build-up of concentrations of HMOs, though should not be socially exclusive in such areas. The loss of bedsits to self-contained homes should require such homes to be affordable and for alternatives to be provided for low income earners. Self contained residential units will never be as affordable as bedsits, so there may be a case for resisting their loss as they solve a particular housing need in a Borough with high property prices. Therefore, Option 1, resisting the loss of HMO may be the most sustainable.</p> <p>Mitigation / Recommendations: non self-contained bedsits should be provided where there is a local need, concentrations should not be allowed to build up, enabling a spread across the Borough. Where such bedsits do not meet space standards consideration should be given to redevelopment of the internal space for continued use as non-self-contained bedsits, where appropriate.</p>
<p>Issue 16: Housing for special needs</p>	<p>Summary: resisting closure of homes, or replacing them with special needs housing within the Borough, is beneficial in terms of maintaining the niche market, social equity/inclusion/diversity, meeting the needs of the Borough's residents and providing accessible healthcare, though there may be further strain on healthcare facilities if nursing homes are lost. Replacing these homes outside the Borough is expected to result in potential healthcare accessibility problems, loss of a niche market and is not providing for local residents needs. Not resisting loss of these homes has strong adverse impacts on health care accessible to residents, meeting residents needs and maintaining social equity/inclusion/diversity. Therefore the preferred option is Option 1 as there will still be need for these services, so replacing them with housing increases the problem, as will building alternative services away from the Borough.</p> <p>Mitigation / Recommendations: policy should take account of the above. Loss of residential homes should be resisted, though where this is not economically viable, and there is sufficient community healthcare capacity, replacement special needs housing should be provided. If this option is not viable potential for residential and nursing home replacements outside the Borough may be considered. As such a hierarchal approach may be appropriate.</p>

Issue 17: Lifetime Homes	<p>Summary: not providing Lifetime Homes (i.e. business as usual) does not meet the needs of all local residents and does not provide social inclusion/equity. Requiring Lifetime Homes should meet residents needs and promote a diverse, socially inclusive community and potentially creating competition/quality in the housing industry. Encouraging Lifetime Homes and leaving developers to choose has the potential to provide the same benefits as requiring Lifetime Homes, however it is not guaranteed that such homes will be built. Option 1, requiring lifetime housing is therefore the more sustainable Option, in addition to following the policy hierarchy of the London Plan it may fulfil some of the housing needs in the Borough.</p> <p>Mitigation / Recommendations: policy should take the above into account. Strong policy wording requiring Lifetime Homes provides most benefit to the community now and in the future</p>
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Offices and Industry	
Issue 18: Encouraging Large-Scale Office Development	<p>Summary: There needs to be a balance between economic growth and environmental and social benefits. Option 2 balances the need for economic development with the location of these developments near accessible public transport. However, this option will need to be balanced with wording in order to prevent the character of some areas being affected negatively. However, Option 2 may be more sustainable, depending on the accessibility of specific Economic Zones to public transport.</p> <p>Mitigation / Recommendations: An option is needed that states that the economic development will be of a type that will benefit both social and environmental sectors.</p>
Issue 19a: maintaining and improving employment choice	<p>Summary: Option 1 emphasis a win-win-win situation where mixed use is the development of choice. The other options offer extremes of uses and as such do not offer flexibility in meeting the demands of the Borough.</p> <p>Mitigation / Recommendations: none</p>
Issue 19b: Maintaining and improving employment choice	<p>Summary: North Kensington is acknowledged as an area of deprivation. In order to regenerate the area in a range of areas, it is recommended that Option 1, a mixed use type approach be adopted to ensure that the community there is sustainable. Purely economic use, or housing may not be productive in areas such as social inclusion and provision of health care.</p> <p>Mitigation / Recommendations: none</p>
Issue 20a: Protecting Small Scale business development	<p>Summary: All the options perform positively in terms of economic SA Objectives, however, the diversity that “micro-units” outlined in Option 2 may offer could prove advantageous in other areas such as social inclusion and cultural heritage.</p> <p>Mitigation / Recommendations: Amalgamate options to produce an option that protects coalescence of units, encourages small businesses and encourages the diversity that “micro-units may” offer.</p>
Issue 20b: Protecting Small Scale business development	<p>Summary: Small businesses in the Borough should be protected as they have been raised as a sustainability issue. All options come out positive in this sense but these need to be amalgamated to create a robust option (or preferred option) which will protect and encourage viable small businesses.</p> <p>Mitigation / Recommendations: Amalgamate options to create a robust option (or preferred option) which will protect and encourage viable small businesses.</p>
Issue 21: Encouraging Small Scale business development	<p>Summary: These options attempt to balance a range of retail scenarios, however, it is apparent that each situation will need to be taken on a case-by-case scenario, being in mind the demands of the Borough and on the site proposed. A hierarchy of uses could be used to assess the appropriateness of sites for the Options. In the assessment, Option 2, 3 and 4 come out as the more sustainable, particularly the protection of small and micro businesses.</p>

	Mitigation / Recommendations: use options not as singular policies but as a series of qualifications that could be used to allocate small businesses in the Borough.
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Transportation	
Issue 22a: Parking	<p>Summary: The impacts upon the economy and social inclusion/diversity are uncertain for most of the options. Options 1 and 3 are considered to be beneficial in terms of air quality and climate change within the Borough, though the impact of potentially less residential developments in terms of economy and social factors may be important however this is not known. Option 2 has potentially adverse impacts on transport, air quality and climate change where parking will not be restricted until capacity is reached. Option 3 is beneficial in terms of restricting on-street parking permit availability and encouraging potential use of sustainable transport and the benefits to traffic, air, pollution and climate change that go with it. Provision of off-street parking in residential developments is beneficial in keeping parked cars off the road, however it encourages car usage. In light of the current pressures on the Borough in terms of parking, and the possible increase in emissions, congestion and other vehicular based environmental effects, and the Borough's accessibility to public transport, a restrictive policy for on-street parking would be preferred.</p> <p>Mitigation / Recommendations: policy should take account of the above. It is important that on-street parking pressure is not increased. In permitting new developments, parking should be given a priority in the design and viability of the development. Parking permits should be used to regulate the amount on on-street parking in the Borough.</p>
Issue 22b: Parking	<p>Summary: the impacts upon the economy and social inclusion/diversity are uncertain for most of the options. It is considered that all the options are beneficial to climate change, air quality, though option 1 is more beneficial. In terms of sustainable transport Option 2 allows for the greatest access and use of public transport, though limiting the use of 'permit free' parking. 'Car clubs' are a relatively new phenomenon and there is uncertainty concerning their use, applicability and viability. Option 2 offers the greatest flexibility, however, in the Borough most new development will have access to public transport so this Option will have effectively the same effects as Option 1.</p> <p>Mitigation / Recommendations: policy should take account of the above. Policy should be bold in encouraging use of car clubs as a potential alternative to 'permit-free'. New residential developments should be 'permit free', particularly where access to the site by public transport is good.</p>
Issue 22c: Parking Standards	<p>Summary: the business as usual option potentially assists in reducing car trips to new developments and therefore reducing emissions and promoting the potential use of sustainable forms of transport. Options 2 and 3, as identified may result in more car traffic and therefore be detrimental to air quality and climate change, they also do not promote sustainable transport. Option 3 has a benefit in economic terms in that it may increase accessibility to commercial developments. Given the levels of access to public transport in the Borough, Option 1 would seem to offer the best solution.</p>

	<p>Mitigation / Recommendations: policy should take account of the above. Current parking standards should be retained and developments should be required to consider accessibility by sustainable transport through providing Green Travel Plans. An option proposing to reduce the current parking provision on new developments should be considered.</p>
<p>Issue 22d: Bicycle parking</p>	<p>Summary: Option 1 provides positive benefits for air quality, climate change, sustainable transport and traffic reduction, however developers only are required to consider the needs of bicyclists and the council are to provide bicycle parking where appropriate so these changes may not occur also requiring provision of bicycle parking is significantly beneficial in promoting/encouraging the use of bicycles and the potential for reductions in vehicle use in accessing new developments. The same is true of Option 4 in terms of on street bicycle parking. Options 5 does not promote bicycle usage and therefore not a movement away from vehicle use and be likely adverse impacts on climate change and air quality. Option 3 is expected to cause significant adverse impacts where new developments may result in significant increases in vehicle traffic, but only where sustainable transport is not promoted. Options 1 and 3 combined would effectively provide the most sustainable option.</p> <p>Mitigation / Recommendations: policy should take account of the above. Policy should require provision for bicycle parking in new developments and encourage more on street bicycle parking.</p>
<p>Issue 22e: Motorcycle parking</p>	<p>Summary: the use of motorcycles may be limited by the number of family households in the Borough, where other forms of transport may be more appropriate and economical for these households. There is however a relatively high number of smaller households in the Borough. Option 1 (business as usual-not seeking to improve/increase existing parking facilities) does not allow for future potential increases in motorcycle/scooter use and potentially misses out on encouraging reduced emissions. Improving motorcycle parking, increasing the number of parking bays and requiring motorcycle parking in appropriate new developments (Options 2 to 4) should be beneficial in terms of reducing emissions and encouraging more sustainable transport methods. It has been assumed that motorcycles produce fewer emissions than other vehicles. Of these Option 2 would seem the more preferable as it will not create any pressure on car parking through the creation of new bays (possibly at the expense of car bays, which are already under pressure).</p> <p>Mitigation / Recommendations: LDF should take account of the above. LDF should improve motorcycle parking, including increasing the number of bays, within the Borough as well as requiring motorcycle parking in appropriate new developments</p>
<p>Issue 22f: Bicycle and Motorcycle Parking</p>	<p>Summary: no options are available to appraise, where consultees are asked to respond to a question</p>

<p>Issue 23a: Streetscape</p>	<p>Summary: business as usual (Option 1) and Option 2 has the potential to be beneficial to the economy, community, crime reduction, and the local distinctive environment and may influence a better quality of open spaces and parks. Option 2 may have a lesser scale of impacts due to only new developments being required to contribute to local streetscape. The assessment of the impacts of option 3 is dependent on what the other areas/measures or aspects of streetscape improvements are. Option 4 it is unlikely to have adverse impacts on the economy, crime, local distinctiveness/environment, social inclusion. Therefore Option 1 would be the most beneficial Option sustainability.</p> <p>Mitigation / Recommendations: policy should take account of the above. There should be a continued emphasis on streetscape issues and where appropriate new developments should contribute to local streetscape improvements. Encouragement of other measures/areas or other aspects of streetscape improvements should also be encouraged, where one of the Councils principles for streetscape is innovation and experimentation.</p>
<p>Issue 23b: Streetscape Improvements</p>	<p>Summary: no options are available to appraise, where consultees are asked to respond to a question</p>
<p>Issue 24: Public transport and new development</p>	<p>Summary: Options 1 and 2 are beneficial in terms of encouraging and providing sustainable transport opportunities, reducing emissions and providing access to developments for those without private transport, however Option 1 may result in overcrowding of good public transport links and Option 2 restricts development location unless there is a continuous improvement in capacity and quality of public transport. Option 3 is beneficial in allowing the new development to locate anywhere in the economy however is likely to cause adverse impacts in terms of greater vehicle trips increasing emissions and not promoting sustainable transport. Option 4 is predicted to have beneficial impacts in terms of economy, air quality, sustainable transport, providing for access by the community. Option 2 is preferred sustainability due to it's consideration of current & future transport capacity, in addition to the accessibility by public transport.</p> <p>Mitigation / Recommendations: policy should take the above into account. Development should be allowed (though not exclusively) where access to public transport is good and there is sufficient capacity, however it is also important is that development be allowed where access to public transport is poor but where improvements are offered by the developer that increase service provision in the area</p>
<p>Issue 25: Bicycling</p>	<p>Summary: Option 1 and 3 provide for bicycling in some form, thus being beneficial in terms of air quality, climate change and promoting sustainable transport methods. Option 1 may hinder bicycle use through perceived safety issues. Option 2 accounts for this through provision of cycle lanes which, however, can promote a full sense of security to cyclists. Providing no specific measures for cyclists (Option 4) is expected to have an adverse impact on attempts to reduce the emissions and in the promotion of sustainable transport methods. Option 2, designated lanes in conjunction with Option 3 (without the lanes exception) would be a preferred option in this case, contributing to providing alternatives to the car, increasing human health and being safer than no designated lanes.</p>

	<p>Mitigation / Recommendations: policy should take account of the above. Policy should provide for good-quality road surface and sufficient parking facilities, as well as encourage bicycling through a wide range of measures.</p>
<p>Issue 26: Gated communities</p>	<p>Summary: Option 1 is the more sustainable option, it allows freedom of members of the community and transport promoting social equity/inclusion. However residents may not feel safe, but this may be mitigated through other means including good design. Option 2 provides perceived safety but does not enable freedom of movement throughout the Borough and may potentially promote car usage and increase house prices where gated communities may be seen as more exclusive.</p> <p>Mitigation / Recommendations: policy should take account of the above. The council should resist proposals to 'gate' new developments or existing communities. The council should encourage good development design and existing community improvements to increase safety (actual and perceived) for residents</p>

Shopping & Town Centres

Issue 27a: The hierarchy of Town Centres

Summary: The principle dividing these options is whether to expand the remit of Shopping Centres to include restaurants, clubs, cinemas, offices and hotels, as per the national approach, or to adopt the hierarchical approach outlined by the London Plan. The sustainability impacts of this choice is that by widening the remit, more trips will be generated to the Town Centres and as such emissions and congestion may increase but in RBKC areas are well served by public transport and as such this may not be the case. By not diversifying, there may be economic consequences due to lack of diversity and social consequence in terms of accessibility. Therefore there should be a hierarchy, based on accessibility that fits shopping centres in RBKC into categories that would determine the level of trip generating uses which they could encompass.. Considering the access to public transport within the Borough, Option 2 would be the more preferred option as it will result in increased access to goods and services, increased economic activity, without the trade-off of increased vehicular traffic.

Mitigation / Recommendations: Utilise the Town Centre Designation for areas that can accommodate the increase in trip generation that this may bring.

Issue 27b: The function of Local Centres

Summary: Option 2 may be preferred as a diverse centre may cater for the majority of local need, including services and facilities and healthcare, reducing the need to travel and encourage a community atmosphere. However, this would have to be economically viable. Option 3 would sacrifice too much in the way of community facilities and services, however, if the area was well served by facilities and services and performed poorly economically then this option would be preferred.

Mitigation / Recommendations: Viability studies into each Local Centre to identify gaps in need both economically and socially and transport infrastructure.

Issue 29: The function of other centres

Summary: Preferred option depends on the specific requirement of the centre. If it is deficient in any of the above, then this should be accommodated in an accessible manner. Accessibility in terms of public transport and general accessibility will be a key test. Centres will be nodes for public transport, so if as many uses as possible are accessible to all from those centres, the better. Therefore, a combination of Option 2 and 3 would be preferred, allowing a limited, justified loss of retail on order to provide essential services and facilities such as drop in centres.

Mitigation / Recommendations: A case –by-case system will need to be proposed where by the deficiencies of an area can be redressed through the application of an option. The options above should be combined to form a tiered test for development, with Option 1 preferred but with a caveat that there should be economic viability.

Issue 30: Maintaining the identity of the Borough's centres and protecting valued uses

Summary: Option 1 is beneficial in terms of aiming to maintain local distinctiveness, which should be beneficial to the local economy, and biodiversity (where natural areas are considered important in an area's character). Maintaining individuality should be beneficial in providing communities with a sense of place, which in turn may potentially be reduce crime. Option 2 is beneficial in maintaining community uses in the local areas, whilst providing for local needs, including health care and youth centres resulting on benefits in crime and health, and maintaining such beneficial uses within the economy, this may also maintain an area's distinctiveness. Option 3 is the opposite of Option 2 and does not ensure provision of valuable uses for the community, in particular it potentially reduces distinctiveness, social inclusion and causing leakages from the economy. Option 4 is beneficial where street markets retain cultural distinctiveness and economic/community diversity. Options 1, 2 and 4 in conjunction would offer the more sustainable options, retaining post offices and other valued uses and retaining street markets will add to the character of particular areas.

Mitigation / Recommendations: A policy which draws upon policies expressing individual character of centres, encourages retention of valued uses, including street markets should be considered, where the combined policy is considered the most sustainable option where planning powers are restricted.

Social & Community Uses

Issue 31a: New social and community uses

Summary: Option 1 takes account of current needs, but may not consider potential future needs for social and community facilities.. Options 1 and 3 provide for current and future community needs, supporting community inclusion, reducing crime and contributing to the economy respectively. Option 2 has an uncertain impact on the economy, access to healthcare and community facilities in that potential competition could provide benefits, however overprovision of such facilities may be detrimental to the existing facilities within a local context. Needs based assessment is critical in promoting and protecting services and facilities, and current resources need to be protects, therefore, Option 1 and 3 are the preferred options and should be amalgamated to create a robust option that not only requires contributions for new developments on a needs based basis but also protects existing resources.

Mitigation / Recommendations: policy should take account of the above. Policy should protect existing 'community uses', support proposals were local need has been identified and continue to plan for future need for 'community uses' within the Borough.

Issue 31b: Broadening the definition of community uses

Summary: no options are available to appraise as the Issues and Options paper requests opinions from consultees

Issue 32: Private Schools and Health Facilities

Summary: Option 1 provides a wide range of choices for the community, enabling access to both private and public health/education etc, putting private facilities on the same level as public facilities may have adverse consequences on public facilities in terms of competition. Option 2 ensures community needs are met. Option 3 enables competition between private facilities (and potentially public facilities) potentially resulting in loss of facilities that were out competed. Option 4 may not provide for the whole community. Ensuring current and future community needs are met is key, therefore, to the provision of new private facilities (as indeed for public facilities) should be awarded on a needs based allocation. Therefore Option 2 is preferred.

Mitigation / Recommendations: policy should take the above into account. Private facilities should only be provided for where local need has been established.

Issue 33: New fee-paying schools

Summary: Option 1 restricts expansion, potentially not allowing provision for future growth. Options 2 and 3, attempt to meet local needs, and although potentially locating away from the residences of pupils, provision of service by highly accessible public transport should reduce the impact of vehicle school journeys and be beneficial to sustainable transport, climate change and air quality. Option 2 reduces nuisance and loss of amenity for residents, whereas Option 3 retains the potential for this to still occur. Option 4 may force those wishing to pay fees to look outside the Borough and when the capacity of existing fee-paying schools is exceeded, therefore local needs are potentially not met, with leakage occurring from the Borough. Option 2 would appear to be the most sustainable, offering the provision of fee – paying schools according to needs and the location of these schools away from residences which could be affected negatively, this is tied into accessibility through public transport.

	<p>Mitigation / Recommendations: A policy should be developed around the establishment of local need for fee-paying schools. Where there is a local need schools policy should promote locations served by highly accessible public transport throughout the Borough, principally in areas that are not largely residential. Provision of schools when there is local need is important in sustainability terms, this should override the loss of amenity and nuisance caused to residents.</p>
<p>Issue 34: Doctor's surgeries</p>	<p>Summary: Option 1 meets the objectives for potentially providing accessible healthcare and community facilities. Option 2 reduces housing stock within the economy available to residents, whilst providing for potentially ensuring healthcare and community facility provision. Option 3 maintains/ further provides for some of the Borough's resident's housing needs, however does not meet healthcare and community facility needs. Option 4 enables provision of healthcare facilities and residential housing to meet the Boroughs identified local needs and provides the opportunity to assess on a case by case basis. However, the loss of GP surgeries has been identified as an issue and as such, in cases where there is marginal difference in need, the preference should be for the provision of GP surgeries over residential use, thus a preferred option of Option 4 combined with Option 2</p> <p>Mitigation / Recommendations: policy should take account of the above. A balance between local need for residential accommodation and need for surgeries should be assessed on a case-by-case basis.</p>

Hotels	
Issue 35: The control of visitor accommodation	<p>Summary: Tourism is an important asset to the Borough and the control of visitor accommodation in the form of hotels will have a direct impact on the tourism capacity of the Borough. Economically it would seem that encouraging more hotel accommodation and more tourism would seem the most appropriate, however, the Borough's tourism value lies in its character and cultural heritage, if this suffers then tourism may follow, so a balance needs to be arrived at. The business as usual option of constraint (Option 1) therefore seems to be appropriate.</p>
	<p>Mitigation / Recommendations: none</p>
Issue 36: The location of visitor accommodation	<p>Summary: Hotel development should take a lead from the sensitivity of the Borough in terms of style of development, it should further locate Hotels and other tourist centres where there is adequate access to public transport. Therefore, a combination of the above options would be preferred, locating hotels where the area is not already saturated, near shopping centres (under the assumption that these are areas with good public transport capacity) and all over the Borough, where need dictates.</p>
	<p>Mitigation / Recommendations: none</p>
Issue 37: The quality of visitor accommodation	<p>Summary: Upper end hotels may increase the level or prestige in which the Borough is regarded, however, Option 3, hotel provision if dictated by market demand, and developed according to the sustainable construction guidelines may result in greater economic benefits for the Borough.</p>
	<p>Mitigation / Recommendations: Integrate with sustainable construction option and further into policy.</p>
Issue 38: Protecting the Hotel Stock	<p>Summary: Whilst the option of using hotels to accommodate housing for multiple requirements would be beneficial, where it is economically viable. In light of the requirements of the London Plan, and the need to provide hotel accommodation for the 2012 Olympics, hotel provision should be increased where it does not have a negative impact on the provision of housing.</p>
	<p>Mitigation / Recommendations: Inclusion of an economic viability caveat in Option 1</p>
Issue 39: Encouraging Tourism	<p>Summary: The economy of the Borough, and its character are interlinked and mutually dependent, so by prioritising one over the other, one may be affected negatively. However, Option 1, maintaining and enhancing the character of the Borough is the main driver of tourism and so should have positive effects overall.</p>
	<p>Mitigation / Recommendations: An option to encourage tourism that is <i>beneficial</i> to the Borough should be considered.</p>

Leisure & Recreation	
Issue 40: Public open space provision	<p>Summary: Options 1, 2 and 3 are beneficial in terms of biodiversity, crime, economy, parks and open spaces, society, community facilities and local distinctiveness where Option 1 aims to provide new public open space attempting to meet current demand, Option 2 attempts to meet deficiencies, whereas Option 3 aims to maintain, and but potentially not increase, parks and open spaces in the Borough. Option 4 has the potential not to provide the public community benefits where private amenity space has priority over public open space.</p> <p>Mitigation / Recommendations: policy should take the above into account. The policy should include a combination of the options identified where the Council should seek new public open space in association with appropriate development throughout the Borough, with appropriate safeguards to ensure that public access is retained, particularly placing an emphasis on areas of public open space deficiency. Where this is not appropriate the Council should seek financial contributions from appropriate development to improve the quality and attractiveness of local parks and other public open space. The Council should encourage the provision of amenity space (including private) within developments as part of good development design</p>
Issue 41: Financial contributions towards public open space	<p>Summary: Option 1 throughout the Borough is socially inclusive, it should improve the attractiveness of the economy, conserve the environment, potentially reduces crime and reinforces the local distinctiveness. Option 2 should provide benefits in terms of the local environment, attractiveness of the economy, biodiversity however these will only be felt locally within the vicinity of the development and not throughout the Borough. Option 3 is beneficial to conservation and in terms of maintaining attractiveness of existing frequently used areas, however may not be socially inclusive of all areas of the Borough where improvements to the attractiveness of less frequently used areas may be restricted. Option 4 although it improves areas near the development area, it does not address areas of deficiency, in fact, it is concerned with development within areas of open space deficiency and so could have the opposite effect. However, it is possible that through sensitive design, there could be increased provision of open space. An additional Option may be to prioritise areas where there has been areas of deficiency already identified, then most used spaces, followed by a possible condition based hierarchy, with those in poor condition being improved as a priority.</p> <p>Mitigation / Recommendations: Additional Option to prioritise areas where there has been areas of deficiency already identified, then most used spaces, followed by a possible condition based hierarchy, with those in poor condition being improved as a priority.</p>
Issue 42: Priority for open space	<p>Summary: Open Space creation should use the methodology and requirements of PPG 17. Additionally, the Open Space Strategy will determine the requirements for Open Space on a needs based system, rather than the SA</p> <p>Mitigation / Recommendations: None</p>

<p>Issue 43: Wider use of Garden Squares and private communal gardens</p>	<p>Summary: Option 1, particularly in terms of the private open space, is beneficial in maintaining the biodiversity held at present, whilst having adverse impacts on social inclusion and access to/use of community facilities (where open spaces, private communal gardens and parks are considered to be community facilities). Option 2 is beneficial in terms of social inclusion/equity and access to community facilities, though may potentially increase crime in surrounding areas which were previously inaccessible. Option 3 is beneficial to biodiversity, the local economy through potentially encouraging tourist/community interest through promoting the local distinctiveness of communal gardens. This option allows limited access to these private open spaces, as do option 4 (groups) and 5 (nearby residents) which are also beneficial to maintaining biodiversity. A key factor will be attaining the permissions to gain access to the private areas, this should be conditional on use. Option would be preferred in socio – economic terms, however, the capacity of the private areas will need to be assessed prior to access being granted to set thresholds for numbers of visitors in order for them to retain their biodiversity, amenity and visual viability.</p> <p>Mitigation / Recommendations: policy should take account of the above. The council should encourage wider general use of Garden squares and private communal gardens, encouraging local groups to utilise this open space. Consideration should be given to pricing schemes for the private open spaces whereby residents of the Borough enter free on production of proof of residence and a small charge is paid by others. This may enable local residents access to open space, and monies raised may encourage trustees/owners of private open spaces to maintain/enhance such open spaces of local distinction to attract Borough visitors, potentially benefiting the economy and biodiversity.</p>
<p>Issue 44: Temporary uses of open space</p>	<p>Summary: Option 1 is beneficial in terms of the economy, social inclusion and use of community facilities, it also increases the potential investment in open spaces and enables some recovery of diversity. Adverse impacts may result in terms of temporary crime increases, loss of biodiversity and impacts to cultural heritage assets. Option 2 is beneficial in terms of social inclusion/cohesion, promoting local distinctiveness, supporting the economy, though damage to these spaces including their biodiversity value may occur. Option 3 maintains open spaces and parks for community use, where they can provide an attractive benefits to the local distinctiveness, biodiversity, social inclusion, economy, community facilities etc. Option 4 has the potential to intensify use of these sites during the summer months (though it does restrict the amount of time available) potentially causing short-term adverse impacts to cultural heritage, biodiversity. A amalgamation of Options 1, 2 and 4 should provide the most sustainable Option, retaining flexibility in use whilst also allowing for cumulative impacts due to wear to be mitigated for.</p> <p>Mitigation / Recommendations: policy should take account of the above. The council should encourage temporary uses, particularly those with additional benefits (cultural, economic, regeneration). Provision of a cumulative maximum time limit for temporary uses is appropriate when it restricts constant use of open spaces for temporary uses over the summer months. Appropriate time should be taken between events that may cause degradation to allow for recover.</p>

<p>Issue 45: Arts, cultural and entertainment facilities</p>	<p>Summary: Option 1 is most beneficial to the economy, social inclusion, community/cultural facilities and encouraging use of sustainable transport through locating at a main transport intersection. Locating in shopping centres is also beneficial where it may require use of previously developed land and encourage multi-purpose trips. Option 2 maintains and improves existing facilities providing similar benefits to option 1 where redevelopments should take account of transportation requirements. Option 3 should provide cultural/community facilities, and social and economic benefits throughout the Borough, however such facilities should be accessible through sustainable transport means. Option 4 allows loss of such facilities having an adverse impact on economy, social, cultural/community facilities throughout the Borough. Protecting existing facilities (Option 2) should be retained but amalgamated with Option 1 to encourage provision of these services and facilities, however, they do not necessarily need to be based in shopping centres, but can be based in any areas where there is suitable provision of public transport.</p> <p>Mitigation / Recommendations: the above should be taken into account in policy. The Council should resist the loss of existing facilities and seek their replacement, encouraging facilities to locate within shopping centres or locations accessible by sustainable transport.</p>
<p>Issue 46: The encouragement of arts, cultural or entertainment facilities</p>	<p>Summary: Option 1 is beneficial to the local economy, society, community and distinctiveness. Option 2 is beneficial in potentially bringing in tourism (though leakage from the economy may occur due to its national and international nature), there are also benefits in terms of cultural heritage and community facilities, though it does not reflect local aspirations and distinctiveness. Option 2 has a potential adverse effect on social cohesion/inclusion. Option 3 should be beneficial to the economy, where a combination of Options 1 and 2 are present, however other impacts such social cohesion/inclusion, are dependent on the type and number of facilities. Option 1 should be preferred, meeting the local needs of the Borough, however, given the nature and international importance of London and the Borough's resources, synergies between local need and internationally important resources should be maximised.</p> <p>Mitigation / Recommendations: policy should take account of the above. The Council should seek a balance between addressing local aspirations through expressing cultural diversity in the area /encouraging local artists and providing nationally/internationally important facilities.</p>
<p>Issue 47: Broadening the definition of community uses</p>	<p>Summary: no appraisal has been undertaken as consultees are asked to respond to a question</p>
<p>Issue 48a: The role of public art</p>	<p>Summary: Provision of public art is beneficial to the economy, social cohesion, local distinctiveness, and contribute to open spaces and parks. Not encouraging public art may have the potential to reduce vandalism, though has potential adverse effects on local distinctiveness, the economy and social inclusion and cohesion.</p> <p>Mitigation / Recommendations: policy should take account of the above. The Council should prefer Option 1 and continue to encourage the provision of public art.</p>

Issue 48b: Location of public art	Summary: Option 1 is beneficial to attractiveness of development sites in terms of economy and local distinctiveness. Option 2 is beneficial in terms of the economy, local distinctiveness, and the attractiveness of public transport, parks and other community facilities. Option 3 is beneficial in terms of improving the attractiveness of the economy, local distinctiveness, community facilities, parks and open spaces, residences. Mitigation / Recommendations: policy should take account of the above. The Council should provide public art throughout the Borough, including development sites. Particularly priority should be given to the Borough's "Gateway" locations
Issue 48c: Sites for public art	Summary: an appraisal has not been undertaken because consultees have been asked to respond to a question.

Renewable Energy & Sustainable Design

Issue 49: Renewable Energy

Summary: Whilst the current UDP policy promotes aspects of encouraging energy efficiency and sustainable design there are some omissions, notably emissions and embodied energy. The LDF can overcome this by requiring new developments to attain a certain level of achievement through an accredited sustainability assessment (such as BREEAM, Ecohomes, CEEQUAL or LEAD). Additionally, there should be flexibility within the option to allow for innovative methods of producing energy rather than restricting choices to solar panels and combi boilers, therefore, option 3 with the requirement for 10% renewables is seen as the most desirable although this should be extended not only to new development but also to major internal changes / renovations of a certain size.

Mitigation / Recommendations: Options could be combined to create one Preferred Option with robust sub policies that detail the specific requirements of the Core Strategy Policy. Would suggest the creation of a Sustainable Construction SPD that goes into more detail in this area particularly considering the high sensitivity of the Borough in terms of cultural heritage and architecture.

Issue 50: Sustainable Design

Summary: There is a trade off to be made between the promotion of sustainable design and energy efficiency, and a key asset of the Borough, its cultural heritage. It is however possible to create energy efficient and sustainable structures that retain the aesthetic and historical appeal of the Borough. Therefore, a balance needs to be reached between Option 2 and 4.

Mitigation / Recommendations: An option proposing that sustainable design and energy efficiency are seen with the same importance and that all effort will be made to meet energy efficiency targets whilst retaining the character of the Borough and the special characteristics of listed buildings

Waste	
Issue 51: Disposal of the Borough's waste	<p>Option 2 may well assist with the disposal of waste, however, it's the production and minimisation of waste that needs to be addressed. If Cremorne Wharf were to open as a recycling facility, of there were facilities nearby in adjacent Boroughs then the implementation of Option 3 would be advantageous. However, waiting for technology to become viable carries risks. An alternative option may be between incineration and minimisation (including the reopening of Cremorne Wharf).</p> <p>The combining of this issues options with those of Cremorne Wharf may produce an integrated solution which both reduces waste produced and increases the % recycled.</p>
Issue 52: Cremorne Wharf	<p>Summary: Assessment is largely in favour of some form of redevelopment, however, more options are needed concerning the disposal of waste, in particular considering the sustainability issues that have been highlighted relating to recycling (some way off target of 25% recycling by 2005 (currently 16.13%) and poor accessibility to recycling and waste disposal facilities (highlighted through consultation). The impact of redevelopment for other uses is often unknown due to type of redevelopment (and it various proportions) affect impacts.</p> <p>Mitigation / Recommendations: Options for other forms of waste disposal and recycling should be put forward.</p>

4 CONCLUSIONS

4.1 Conservation & Development

4.1.1 The conservation status of RBKC underpins the Borough's character and creates an important source of economic activity. Additionally, the benefits of the accessible open spaces and green areas have both visual and other positive effects for residents. These include benefits to on health and general well being. It is therefore important to balance these benefits with those associated with development in the Borough. The Options put forward by RBKC attempt to achieve this win-win situation. There is the potential to achieve this through the options highlighted as sustainable in the assessment. Key points arising from the assessment are:

- Options could include the aspiration of enhancing Urban Biodiversity in the Borough; and
- A proactive Option concerning the identification of sites suitable for tall buildings could be considered.

4.2 Housing

4.2.1 The demand for housing in the UK is well documented; with RBKC this is no exception. What is exceptional in the Borough is its high density, accessibility to public transport, and conservation and cultural heritage. With over 70% of the Borough in Conservation Areas, over 4000 listed buildings⁵ and the second lowest amount of open space per resident on the UK, there are major constraints on the borough in terms of the supplying of newly built homes. The Options put forward by the Council offer, in varying degrees, ways of supplying this housing, and indeed the make up of this housing in terms of provision for affordable homes, intermediate and social accommodation. Key points arising from the assessment are:

- Options could ensure that higher density residential areas should have adequate provision of infrastructure facilities, including transport and health;
- High design standards should be included in Options;
- Options for mixed use schemes should include affordable and key worker housing provision; and
- An Option for 'Lifetime homes' should be encouraged.

4.3 Offices & Industry

4.3.1 Economic activity is vital for a sustainable Borough. It both retains and attracts skills. However, the type of economic activity encouraged in the Borough should be controlled. This is not only due to the built heritage designations that dominate the Borough but also due to current transport infrastructure capacity and the

⁵ Grade II, II* and I

logistics involved to increase this capacity for other uses. The issues surrounding the availability of small business units are documented in the Scoping Report which highlights the importance of encouraging and retaining these businesses. This will not only protect existing business, but also encourage micro-business that in turn may assist in creating a more vibrant Borough. Key messages from this assessment indicate:

- In areas of deprivation, mixed use development may be appropriate;
- Amalgamation of two existing options, namely the provision of micro-units alongside protecting small units.

4.4 Transportation

4.4.1 Accessibility in terms of both public transport and that of the private car is a major consideration in the location of new development throughout London. Access to public transport and smooth flow of vehicular traffic are attractive to individuals and organisations who may wish to locate in the Borough. RBKC is well served by public transport, including buses, underground and over ground trains. Most areas of the borough are well enough served by public transport for retail use, however, points that came out of the assessment are:

- Options could place a greater emphasis on the alternatives to the motorcar, including the encouragement of bicycles and car clubs, and
- Options should emphasise the importance of good design of streetscape, preserving the character of the Borough whilst enhancing the distinctiveness in the Borough.

4.5 Shopping and Town Centres

4.5.1 RBKC is home to many important retail areas such as Kensington High Street, Kings Road and Portobello Road. These areas contribute to the character of the Borough. However, shopping and town centres can be utilised for other uses to create highly accessible assets for all due to the highly accessible nature of some of these sites. Key messages for the assessment include:

- An Option to redesignate where there is infrastructure capacity to cope with extra trip generation; and
- A Option combining the recognition of the importance of a centre's character, valued uses and street markets should be considered.

4.6 Social & Community Uses

4.6.1 Social and community uses provide essential assets for a sustainable community, including health, education and social facilities. As such, in a Borough as densely populated as RBKC, it is important that accessible facilities are available. Key messages from the assessment are:

- Options should not only protect existing resources but could also require contributions from new developments; and
- Where there is a marginal difference in need on a case-by-case basis, (between residential and doctors surgeries) the preference should be for the latter.

4.7 Hotels

4.7.1 Hotels are a use which contribute to the Royal Borough's economy in terms of investment, local employment and tourism. However, as with any new development, their impacts on the built heritage of the Borough must be considered, Key messages from this assessment include:

- Sustainable construction should be integrated in to Options;
- Tourism that is beneficial to the Borough should be encouraged and leakage to adjacent Boroughs should be contained.

4.8 Leisure & Recreation

4.8.1 Leisure and recreation is implicit to open space. There are distinct areas of deficiency of open space in the Borough which combined with the highest housing density in the UK, creating pressure on the existing parks, gardens and open space. The capacity of the current sites to accommodate growth / current use will be affected by any future increases in population, furthermore, the capacity of these areas needs to be borne in mind when considering new development. Key messages that arose from the assessment are:

- Open space can be tied to biodiversity and options could reflect this; and
- Options should reflect the needs of the community.

4.9 Renewable Energy and Sustainable Design

4.9.1 The target of 10% on site renewable energy for new developments, as proscribed in the London Plan, will be a challenging target for the Borough. This is due to in part to the built heritage designations dominating the Borough such as listed buildings and conservation areas. The assessment indicated that whilst there may be more sustainable options in terms of energy consumption, there may be trade offs in regard to the cultural heritage and conservation of the Borough. Key messages from the assessment are:

- Options should endeavour to define a sustainable way of introducing renewables and energy efficiency measures into protected areas without significantly negatively affecting their intrinsic value; and
- Ensuring that new developments meet energy standards such as BREEAM / Ecohomes and CEEQUAL without altering the nature of the borough's built heritage and cultural realm could be included in the Options.

4.10 Waste

4.10.1 Disposal of waste is an issue of concern not only in the Borough but also throughout the UK. In particular to RBKC, the access to recycling facilities and the retrieval of waste from areas of high housing density are problematic. Additionally, Cremorne Wharf offers some Options as to how to dispose of waste. The assessment has produced the following comments:

- Options should include combine measures to ensure that waste is disposed of effectively; and
- Options should attempt to minimise the production of waste.

⁶ Grade II, II* and I

APPENDICES
