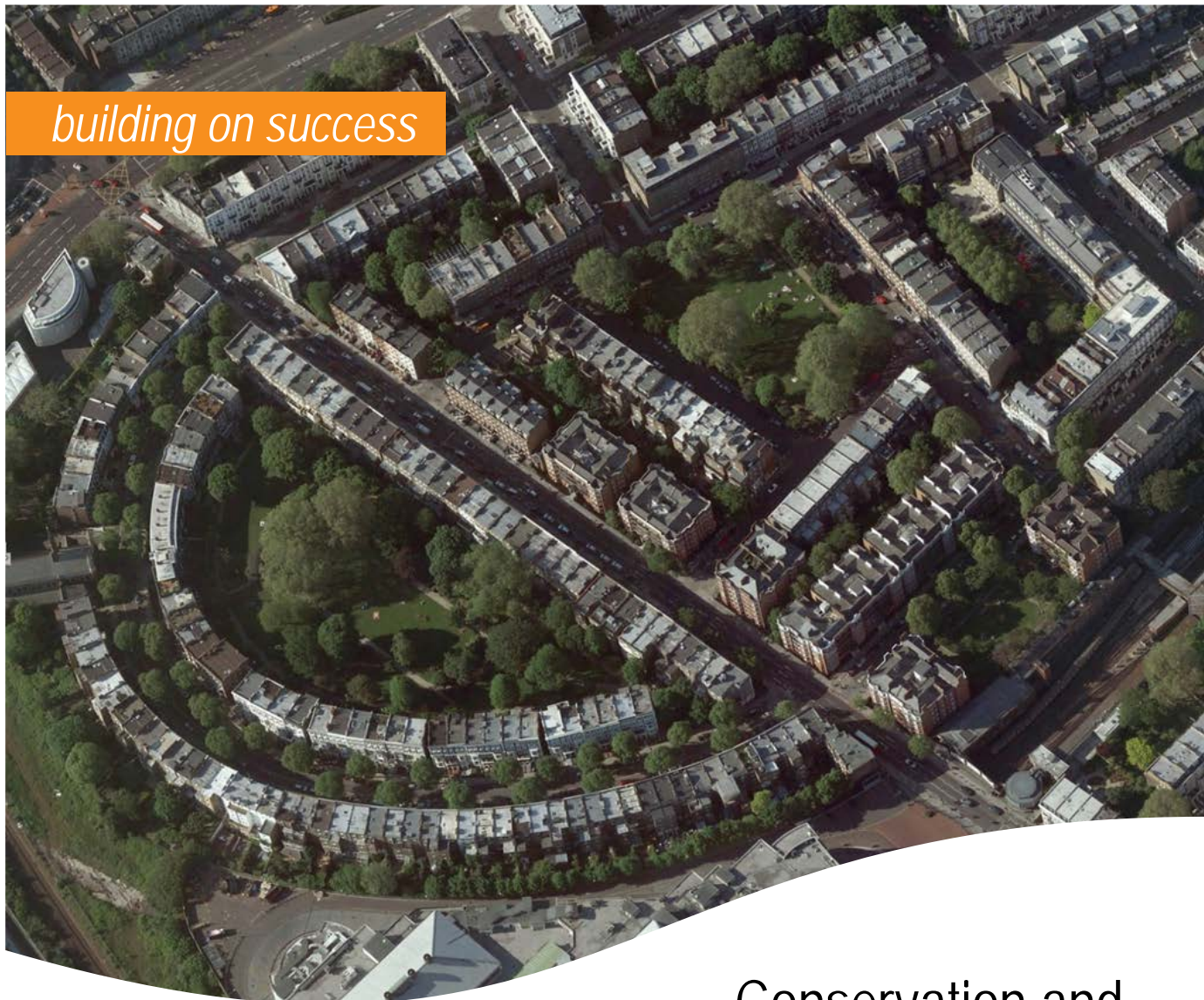


building on success



Conservation and Design policy review

Addendum to Core Strategy
Sustainability Appraisal/Strategic
Environmental Assessment

Partial Review of the Core Strategy



THE ROYAL BOROUGH OF
**KENSINGTON
AND CHELSEA**

February 2014

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Conservation and Design Policy Review

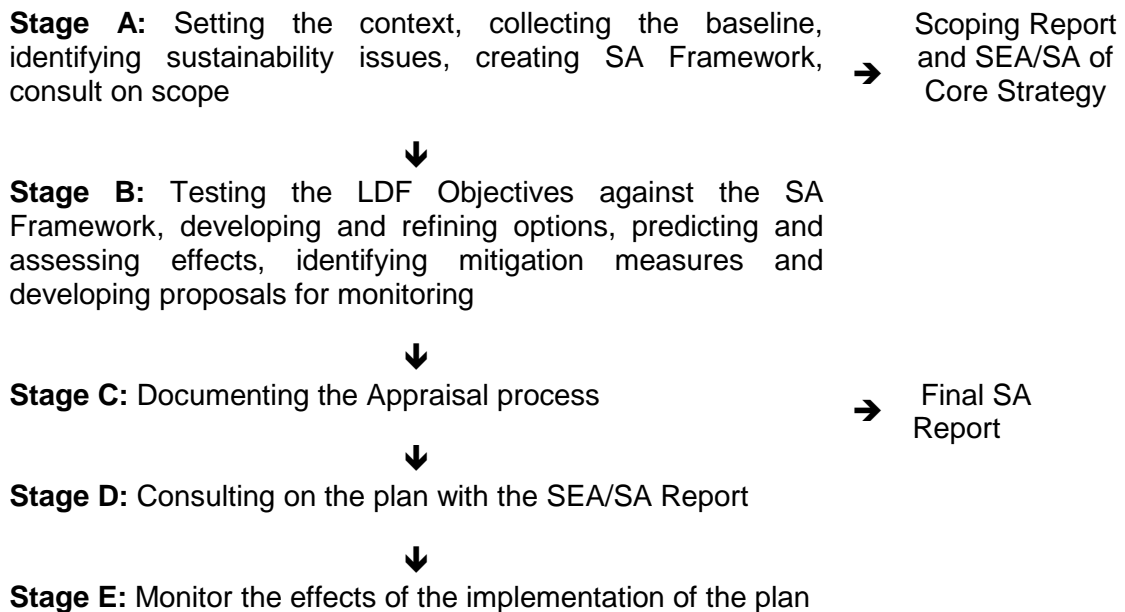
Addendum to Core Strategy SA/SEA

1.0 Purpose of the Sustainability Appraisal and the Sustainability Appraisal Report

- 1.1 The Strategic Environmental Assessment (SEA) / Sustainability Appraisal (SA) of the Conservation and Design policy review has been undertaken by the Planning and Borough Development Department of the Royal Borough of Kensington and Chelsea.
- 1.2 SEA involves the systematic identification and evaluation of the environmental impacts of a strategic action (e.g. a plan or programme). In 2001, the EU legislated for SEA with the adoption of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive'). The Directive entered into force in the UK on 21 July 2004 and applies to a range of English plans and programmes including Local Development Frameworks (LDFs).
- 1.3 The UK Government has chosen to implement the SEA directive through 'Sustainability Appraisal' (SA), a method that fully encompasses economic and social concerns, as well as those of the environment. Under the Planning and Compulsory Purchase Act 2004 (PCPA), Local Authorities must undertake SA for each of their Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs) – the constituent parts of the LDF.
- 1.4 A sustainability framework has been prepared by the Council for all documents within the LDF. This is reviewed with each individual document, and an addendum scoping report prepared.
- 1.5 In October 2005, the Government published guidance on undertaking combined SEA/SA of LDFs ('the Guidance'¹). This guidance was followed for the production of the SA.
- 1.6 The SEA Directive sets out a statutory process that must be followed. The SEA Requirement Checklist (Table 1.1) and Quality Assurance checklist (Appendix V) have been used to ensure the requirements of the SEA Directive are met.
- 1.7 This SA Report supports the public consultation on the Conservation and Design policy review document, as required by Regulation 24 of the Town and Country Planning (Local Development) (England) Regulations, 2004. It is intended to inform decision makers within the Council, alongside public and stakeholder responses to the consultation
- 1.8 Figure 1 shows the five-stage approach of the SA/SEA process recommended in the Guidance.

¹ODPM (2005) Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents.

Figure 1: Five Stages of SA preparation process (ODPM, 2005 p.58)



- 1.9 It should be noted that is an addendum to the Final SA that was prepared for the Core Strategy in October 2009. It does not go into the level of detail of the original SA but simply appraises the policies proposed for inclusion, and ensure that their incorporation into the Core Strategy would not have unintended consequences. These 'extant' policies have been in place and well used for the past 20 years. No negative impacts have been reported during these years and therefore they are not expected to be harmful.

2.0 History of the Core Strategy SA

- 2.1 The SA for the Core Strategy commenced during 2005, with the compilation of evidence base information and a scoping consultation with the statutory consultees (Environment Agency, Natural England's two predecessor bodies and English Heritage) and other key stakeholders. At each stage in the preparation of the Core Strategy (Issues and Options, Preferred Options and Publication), the SA has tested the Core Strategy against the 16 objectives that reflect relevant sustainable development policy objectives.
- 2.2 The Core Strategy and a number of options were tested to determine their potential to give rise to significant effects, ways of mitigating adverse effects and maximising beneficial effects. As part of the iterative process of developing the Core Strategy, recommendations and amendments have been made by the SA at various stages and incorporated into the Core Strategy as it has developed. The final SA report dates from October 2009.
- 2.3 Before the adoption of the Core Strategy's a number of supplementary documents have been adopted, including transport, air quality, and noise and vibration. Each of

these has been subject to SA, and are linked to the extant UDP policies which are now proposed to be incorporated into the Local Plan.

3.0 Addendum to Core Strategy SA

- 3.1 This report extends the LDF SA / SEA to include the issues around updating our conservation policies as part of the wider Core Strategy review. The intention is that all our policies concerning conservation and character will be consolidated and updated. This includes our Extant UDP policies, which were adopted in 2002 and thus have not previously been subject to an SEA. These currently form a separate document, but we intend that any relevant policies will be incorporated into the Core Strategy
 - 3.2 Whilst the process is simply to bring existing policies from the UDP to the Core Strategy, the UDP policies were not subject to an initial SA/SEA as the UDP predated the process at the time of its adoption. However, the topics were later assessed through the SA of Supplementary Planning Documents and the Core Strategy.
 - 3.3 This addendum report provides an update by assessing the policies to be incorporated from the old UDP to the Local Plan, and should be read in conjunction with the original SA for the Core Strategy. The update does not contain any substantive change to policy; however, it is considered that to bring the Local Plan into line with current legislative requirements, the 'saved' policies should be subject to an SA appraisal.
 - 3.4 These 'saved' policies are intrinsically linked to the existing Core Strategy policies which were subjected to the SA process in 2009. The incorporation of the 'saved' policies will give more weight to the aims and requirements of the CS strategic objectives and policies. Although these 'saved' UDP policies have been successfully used in the borough over the past 20 years, their appraisal by this addendum SA assessed the potential impacts and includes monitoring and mitigation measures to reduce them.
 - 3.5 It should be stressed that these amendments are **not intended to alter the aim of the policies**, nor the meaning of the plan taken as a whole. We are suggesting minor amendments to the wording to bring the policies and the text up to date and ensure they are as effective as possible.
-

4.0 Policy Background

- 4.1 The Royal Borough of Kensington and Chelsea adopted its Core Strategy in December 2010. One of our strategic objectives in the Core Strategy is for *Renewing the Legacy*, which is an integral part of the central vision of Building on Success. The exceptional quality of the built environment underpins the reputation of both Kensington and Chelsea, and our residents' quality of life.
- 4.2 Strategic objective CO5 sets out to pass to the next generation a Borough that is better than today, of the highest quality and inclusive for all. This will be achieved by taking great care to maintain, conserve and enhance the glorious built heritage we

have inherited and to ensure that where new development takes place it enhances the Borough.

- 4.3 In the Core Strategy particular reference is made to the Borough's townscape, which is unique in its high quality, finely grained, historic built environment with a strong context and character. The Council has a reputation of upholding high standards of conservation and design.
- 4.4 The purpose of the policy review is to consolidate our planning policy concerning character and conservation. The main issue is to ensure the Core Strategy subsumes the Extant UDP policies and strategic conservation guidance found in our Conservation Area Proposals Statements.
- 4.5 The proposed policies for inclusion and incorporation into the Local Plan are set out in the following sections, and their compatibility appraised where necessary against the SA objectives. Option 1 ('the policy') represents the proposed policy inclusion to the CS/Local Plan. The alternative Option 2 for the purposes of assessing the policies against the SA objectives will be deletion of the UDP extant policies without incorporating any changes or additional policies into the CS/Local Plan, in other words 'no policy'.
-

5.0 Assessment of the Policy Options

- 5.1 Under the SEA Directive, plan and programme, proponents should ensure that: "reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated" (Article 5(1)) and the Environmental Report should include "an outline of the reasons for selecting the alternatives dealt with" (Annex I (h)).
- 5.2 There are two options to consider for each policy, which are the following:
- Option 1:** The Council should incorporate the extant policy into the Local Plan.
- Option 2:** The Council should not incorporate the extant policy into the Local Plan.
- 5.3 The aims of the different Policy options are to protect assets that are important to the community and to the historic environment. It is considered that the Council's 16 SA objectives set out in the LDF SEA/SA Scoping Report are appropriate to assess the implications of the emerging policy.

SA objectives

1. To conserve and enhance the natural environment and biodiversity
2. To reduce crime and anti-social behaviour and the fear of crime
3. To support a diverse and vibrant local economy to foster sustainable economic growth
4. To encourage social inclusion (*including access*), equity, the promotion of equality and a respect for diversity
5. To minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables and adopt measures to adapt to climate change
6. To reduce the risk of flooding to current and future residents

7. To improve air quality in the Royal Borough
8. To protect and enhance the Royal Borough's parks and open spaces
9. To reduce pollution of air, water and land
- 9a. To prioritise development on previously developed land
10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic
11. To reduce the amount of waste produced and maximise the amount of waste that is recycled
12. To ensure that social and community uses and facilities which serve a local need are enhanced, protected, and to encourage the provision of new community facilities
13. To aim that the housing needs of the Royal Borough's residents are met
14. To encourage energy efficiency through building design; maximise the re-use of building's and the recycling of building materials
15. To ensure the provision of accessible health care for all Borough residents
16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage

5.4 The following section contains individual tables which assess the compatibility of the different policy options with the SA objectives. The text for consideration is show in red. Table 2.1 shows the marking scheme used.

Table 5: Marking scheme

+	Objectives are compatible
-	Objectives are conflicting
?	Objective correlation is unknown
X	No Objective correlation (i.e. unlikely to have a significant effect)

6.0 RENEWING THE LEGACY

6.1 CONTEXT AND CHARACTER

6.1.1 Policy CL1

The Council will require all development to respect the existing context, character and appearance, taking opportunities available to improve the quality and character of buildings and the area and the way it functions, including being inclusive for all.

To deliver this the Council will:

- a. require development, to contribute positively to the townscape through the architecture and urban form addressing matters such as scale, height, bulk, mass, proportion, plot width, building lines, street form, rhythm, roofscape, materials and historic fabric as well as vistas, views, gaps, and open space;
- b. require development to respond to the local context;
- c. require the density of development to be optimised, but sensitive to context;
- d. require riverside and canalside development to enhance the waterside character and setting, including opening up views and securing access to the waterway;
- e. require development within the Thames Policy Area to protect and improve the strategic importance and iconic role that the Thames plays in London;

- f. require a comprehensive approach to site layout and design including adjacent sites where these are suitable for redevelopment, resisting schemes which prejudice future development potential and/or quality;
- g. require the development of backland sites to ensure vehicular and pedestrian access is properly integrated into the surrounding street network and that the scale and massing respect the hierarchy of the existing urban block so as to enhance the character of the area;
- h. ensure that, in carrying out alterations and extensions, the characteristics of the type of building, such as mews, terrace or mansion block, is preserved and enhanced;
- i. resist the demolition of, and inappropriate alterations and extensions to, artists' studios.

TABLE CL1

SA OBJECTIVE	Option 1	Option 2	COMMENT
1. To conserve and enhance the natural environment and biodiversity.	X	X	There is no correlation between the policy and this SA objective.
2. Reduce crime and anti-social behaviour and the fear of crime.	X	X	There is no correlation between the policy and this SA objective.
3. To support a diverse and vibrant local economy to foster sustainable economic growth.	X	X	There is no correlation between the policy and this SA objective.
4. Encourage social inclusion, equity, the promotion of equality and a respect for diversity.	X	X	There is no correlation between the policy and this SA objective.
5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables.	X	X	There is no correlation between the policy and this SA objective.
6. Reduce the risk of flooding to current and future residents.	X	X	There is no correlation between the policy and this SA objective.

7. Improve air quality in the Royal Borough.	X	X	There is no correlation between the policy and this SA objective.
8. Protect and enhance the Royal Borough's parks and open spaces.	X	X	There is no correlation between the policy and this SA objective.
9. Reduce pollution of air, water and land.	X	X	There is no correlation between the policy and this SA objective.
9a. Prioritize development on previously developed land.	X	X	There is no correlation between the policy and this SA objective.
10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic.	+	X	The updated policy requires development of backland sites ensures vehicular and pedestrian access is integrated which has the potential to encourage use of different modes of transport.
11. Reduce the amount of waste produced and maximise the amount of waste that is recycled.	X	X	There is no correlation between the policy and this SA objective.
12. Ensure that social and community uses and facilities which serve a local need are enhanced, protected, and to encourage the provision of new community facilities.	X	X	There is no correlation between the policy and this SA objective.
13. To aim that the housing needs of the Royal Borough's residents are met.	X	X	There is no correlation between the policy and this SA objective.
14. Encourage	X	X	There is no correlation between the

energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials.			policy and this SA objective.
15. Ensure the provision of accessible health care for all Borough residents.	X	X	There is no correlation between the policy and this SA objective.
16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage.	++	+	The updates to CL1 further reinforce the requirement for all development to respect the existing context, character and appearance of an area taking opportunities available to improve the quality and character of an area. It therefore has a stronger positive relationship than option 2.

6.1.2 Explanation of Table CL1

6.1.3 Option 1 has a positive relationship with only 2 of the objectives, number 10 and 16. Option 2 has a positive relationship only with objective 16. There are no negative relationships between either of the policy options and the remainder of the objectives.

6.1.4 The updated policy requires that the development of backland sites ensures vehicular and pedestrian access is integrated which has the potential to encourage use of different modes of transport, therefore option 1 has a positive relationship with SA objective 10.

6.1.5 Option 2 provides updates which further reinforce the requirement for all development to respect the existing context, character and appearance of an area taking opportunities available to improve the quality and character of an area. It therefore has a strong relationship with objective 16, stronger than that which option 2 has.

6.2 DESIGN QUALITY

6.2.1 Policy CL2

The Council will require all development to be of the highest architectural and urban design quality, taking opportunities to improve the quality and character of buildings and the area and the way it functions.

To deliver this the Council will:

- a. require development to be:
 - i. Functional - fit for purpose and legible;

- ii. Robust - well built, remain in good condition and adaptable to changes of use, lifestyle, demography and climate;
- iii. Attractive - pleasing in its composition, materials and craftsmanship;
- iv. Locally distinctive - responding well to its context;
- v. Sustainable - in the use of resources, including energy, in construction and operation;
- vi. Inclusive - accessible to all;
- vii. Secure - designs out crime;
- b. require an appropriate architectural style on a site by-site basis, in response to:
 - i. the context of the site;
 - ii. the building's proposed design, form and use;
 - iii. whether the townscape is of uniform or varied character;
- c. facilitate the redevelopment of 'eyesores' by offering flexibility in relation to policies which make redevelopment with buildings more suited to their context demonstrably unviable.

Table CL2

SA OBJECTIVE	Option 1	Option 2	COMMENT
1. To conserve and enhance the natural environment and biodiversity.	X	X	There is no correlation between the policy and this SA objective.
2. Reduce crime and anti-social behaviour and the fear of crime.	+	+	Both the updated and existing policy have a positive relationship with this objective as it requires development to be secure, and design out crime.
3. To support a diverse and vibrant local economy to foster sustainable economic growth.	X	X	There is no correlation between the policy and this SA objective.
4. Encourage social inclusion, equity, the promotion of equality and a respect for diversity.	+	+	Both the updated and existing policy have a positive relationship with this objective, as they require development to be inclusive and accessible to all.
5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables.	+	+	Both the updated and existing policy have a positive relationship with this objective, as they require development to be sustainable in the use of resources, including energy, in construction and operation.
6. Reduce the risk of flooding to current and future residents.	X	X	There is no correlation between the policy and this SA objective.
7. Improve air quality in the Royal	x/+	x/+	There is a slight positive relationship between the updated and existing

Borough.			policy and this objective, the requirement that development is sustainable in terms of its construction and operation may have a positive impact on air quality.
8. Protect and enhance the Royal Borough's parks and open spaces.	X	X	There is no correlation between the policy and this SA objective.
9. Reduce pollution of air, water and land.	X	X	There is no correlation between the policy and this SA objective.
9a. Prioritize development on previously developed land.	X	X	There is no correlation between the policy and this SA objective.
10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic.	X	X	There is no correlation between the policy and this SA objective.
11. Reduce the amount of waste produced and maximise the amount of waste that is recycled.	+	+	Both the updated and existing policy have a positive relationship with this objective, as they require development to be sustainable in the use of resources during construction and operation.
12. Ensure that social and community uses and facilities which serve a local need are enhanced, protected, and to encourage the provision of new community facilities.	X	X	There is no correlation between the policy and this SA objective.
13. To aim that the housing needs of the Royal Borough's residents are met.	X	X	There is no correlation between the policy and this SA objective.
14. Encourage	+	+	Both the updated and existing policy

energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials.			have a positive relationship with this objective, as they require development to be sustainable in the use of resources during construction and operation.
15. Ensure the provision of accessible health care for all Borough residents.	X	X	There is no correlation between the policy and this SA objective.
16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage.	+	+	Both the updated and existing policy have positive relationships with this objective, as both require development to be attractive, locally distinctive and of an appropriate architectural style dependent on the site and use of the building.

6.2.2 Explanation of Table CL2

Both options have the same positive relationship with SA objectives 2, 4, 5, 7, 11 and 16.

6.3 HERITAGE ASSETS-CONSERVATION AREAS AND HISTORIC PLACES

6.3.1 Policy CL3

The Council will require development to preserve and to take opportunities to **enhance the cherished and familiar local scene.**

To deliver this the Council will:

a. require development to preserve or enhance the character or appearance of the conservation area and protect the special architectural or historic interest of the area and its setting;

b. resist the change of use of any building where the current use contributes to the character of the surrounding area and to its sense of place;

c. resist substantial demolition in conservation areas unless it can be demonstrated that:

i. the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss;

ii. the building or part of the building or structure makes no positive contribution to the character or appearance of the area;

iii. a scheme for redevelopment has been approved;

d. require full planning applications in conservation areas

TABLE CL3

SA OBJECTIVE	Option 1	Option 2	COMMENT
1. To conserve and enhance the natural environment and biodiversity.	X	X	There is no correlation between the policy and this SA objective.
2. Reduce crime and anti-social behaviour and the fear of crime.	X	X	There is no correlation between the policy and this SA objective.
3. To support a diverse and vibrant local economy to foster sustainable economic growth.	X	X	There is no correlation between the policy and this SA objective.
4. Encourage social inclusion, equity, the promotion of equality and a respect for diversity.	X	X	There is no correlation between the policy and this SA objective.
5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables.	X	X	There is no correlation between the policy and this SA objective.
6. Reduce the risk of flooding to current and future residents.	X	X	There is no correlation between the policy and this SA objective.
7. Improve air quality in the Royal Borough.	X	X	There is no correlation between the policy and this SA objective.
8. Protect and enhance the Royal Borough's parks and open spaces.	X	X	There is no correlation between the policy and this SA objective.
9. Reduce pollution of air, water and land.	X	X	There is no correlation between the policy and this SA objective.
9a. Prioritize development on previously	-	-	Both policy options have a negative relationship with the objective as they seek to resist the demolition or

developed land.			redevelopment of buildings in conservation areas in certain circumstances.
10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic.	X	X	There is no correlation between the policy and this SA objective.
11. Reduce the amount of waste produced and maximise the amount of waste that is recycled.	X	X	There is no correlation between the policy and this SA objective.
12. Ensure that social and community uses and facilities which serve a local need are enhanced, protected, and to encourage the provision of new community facilities.	X	X	There is no correlation between the policy and this SA objective.
13. To aim that the housing needs of the Royal Borough's residents are met.	X	X	There is no correlation between the policy and this SA objective.
14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials.	X	X	There is no correlation between the policy and this SA objective.
15. Ensure the provision of accessible health care for all Borough residents.	X	X	There is no correlation between the policy and this SA objective.
16. To reinforce local distinctiveness,	++	+	Both policy options have a positive relationship with this objective as

local environmental quality and amenity through the conservation and enhancement of cultural heritage.			they both require development to preserve the character and appearance of the conservation area. However, the updated policy has a stronger positive relationship.
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6.3.2 Explanation of Table CL3

Both policy options have the same relationships with SA objectives 9a (both negative) and 16 (positive). Option 1, the updated policy, requires that development takes opportunities to enhance the cherished and familiar local scene, and resist the change of use of any building where the current use contributes to the character of the surrounding area; therefore this has a stronger positive relationship with SA objective 16 making this the preferred option.

6.4 HERITAGE ASSETS - LISTED BUILDINGS, SCHEDULED ANCIENT MONUMENTS AND ARCHAEOLOGY

6.4.1 Policy CL4

The Council will require development to protect **the heritage significance** of listed buildings, scheduled ancient and sites of archaeological interest.

To deliver this the Council will:

- a. require all development and any works for alterations or extensions related to listed buildings, scheduled ancient monuments and sites of archaeological interest, to preserve the heritage significance of the building, monument or site or their setting or any features of special architectural or historic interest;
- b. resist the demolition of listed buildings in whole or in part, or the removal or modification of features of architectural importance, both internal and external;
- c. require the preservation of original architectural features, and later features of interest, both internal and external;
- d. require the reinstatement or removal of internal or external architectural features of listed buildings or scheduled ancient monuments, commensurate with the scale of the development;
- e. resist the change of use of a listed building that would materially harm its character;
- f. strongly encourage any works to a listed building to be carried out in a correct, scholarly manner by appropriate specialists;
- g. require desk based assessments and where necessary archaeological field evaluation before development proposals are determined, where development is proposed on sites of archaeological significance or potential

TABLE CL4

SA OBJECTIVE	Option 1	Option 2	COMMENT
1. To conserve and enhance the natural environment and	X	X	There is no correlation between the policy and this SA objective.

biodiversity.			
2. Reduce crime and anti-social behaviour and the fear of crime.	X	X	There is no correlation between the policy and this SA objective.
3. To support a diverse and vibrant local economy to foster sustainable economic growth.	X	X	There is no correlation between the policy and this SA objective.
4. Encourage social inclusion, equity, the promotion of equality and a respect for diversity.	X	X	There is no correlation between the policy and this SA objective.
5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables.	X	X	There is no correlation between the policy and this SA objective.
6. Reduce the risk of flooding to current and future residents.	X	X	There is no correlation between the policy and this SA objective.
7. Improve air quality in the Royal Borough.	X	X	There is no correlation between the policy and this SA objective.
8. Protect and enhance the Royal Borough's parks and open spaces.	X	X	There is no correlation between the policy and this SA objective.
9. Reduce pollution of air, water and land.	X	X	There is no correlation between the policy and this SA objective.
9a. Prioritize development on previously developed land.	-	-	Both policy options have a negative relationship with the objective as they seek to resist the demolition or redevelopment of listed buildings.
10. To promote traffic reduction and encourage more sustainable alternative forms of	X	X	There is no correlation between the policy and this SA objective.

transport to reduce energy consumption and emissions from vehicular traffic.			
11. Reduce the amount of waste produced and maximise the amount of waste that is recycled.	X	X	There is no correlation between the policy and this SA objective.
12. Ensure that social and community uses and facilities which serve a local need are enhanced, protected, and to encourage the provision of new community facilities.	X	X	There is no correlation between the policy and this SA objective.
13. To aim that the housing needs of the Royal Borough's residents are met.	X	X	There is no correlation between the policy and this SA objective.
14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials.	X	X	There is no correlation between the policy and this SA objective.
15. Ensure the provision of accessible health care for all Borough residents.	X	X	There is no correlation between the policy and this SA objective.
16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of	++	+	Both policy options have a positive relationship with this objective as they both require development to protect listed buildings; the updated policy however requires the significance in particular to be protected.

cultural heritage.			
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6.4.2 Explanation of table CL4

The policy has been reworded and not changed, the relationship between the policy and the relevant SA objectives 9a (negative) and 16 (positive) have remained the same, however, option 1 would have a slightly more positive relationship with SA objective 16 as it requires that the significance of a listed building be protected. This is therefore the preferred option.

6.5 LIVING CONDITIONS

6.5.4 Policy CL5

The Council will require all development ensure good living conditions for occupants of new, existing and neighbouring buildings.

To deliver this the Council will:

- a. require applicants to take into account the prevailing characteristics of the area;
- b. ensure that good standards of daylight and sunlight are achieved in new development and in existing properties affected by new development;
- c. require that there is reasonable visual privacy for occupants of new development and for occupants of existing properties affected by new development;
- d. require that there is no harmful increase in the sense of enclosure to existing buildings and spaces neighbouring gardens, balconies and terraces;
- e. require that the reasonable enjoyment of the use of buildings and spaces is not harmed due to increases in traffic, servicing, parking, noise, disturbance, odours or vibration or local microclimatic effects.

TABLE CL5

SA OBJECTIVE	Option 1	Option 2	COMMENT
1. To conserve and enhance the natural environment and biodiversity.	X	X	There is no correlation between the policy and this SA objective.
2. Reduce crime and anti-social behaviour and the fear of crime.	X	X	There is no correlation between the policy and this SA objective.
3. To support a diverse and vibrant local economy to foster sustainable economic growth.	X	X	There is no correlation between the policy and this SA objective.
4. Encourage social inclusion, equity, the promotion of equality and a	X	X	There is no correlation between the policy and this SA objective.

respect for diversity.			
5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables.	X	X	There is no correlation between the policy and this SA objective.
6. Reduce the risk of flooding to current and future residents.	X	X	There is no correlation between the policy and this SA objective.
7. Improve air quality in the Royal Borough.	X	X	There is no correlation between the policy and this SA objective.
8. Protect and enhance the Royal Borough's parks and open spaces.	X	X	There is no correlation between the policy and this SA objective.
9. Reduce pollution of air, water and land.	X	X	There is no correlation between the policy and this SA objective.
9a. Prioritize development on previously developed land.	X	X	There is no correlation between the policy and this SA objective..
10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic.	X	X	There is no correlation between the policy and this SA objective.
11. Reduce the amount of waste produced and maximise the amount of waste that is recycled.	X	X	There is no correlation between the policy and this SA objective.
12. Ensure that social and community uses	X	X	There is no correlation between the policy and this SA objective.

and facilities which serve a local need are enhanced, protected, and to encourage the provision of new community facilities.			
13. To aim that the housing needs of the Royal Borough's residents are met.	X	X	There is no correlation between the policy and this SA objective.
14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials.	X	X	There is no correlation between the policy and this SA objective.
15. Ensure the provision of accessible health care for all Borough residents.	X	X	There is no correlation between the policy and this SA objective.
16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage.	++	+	Both policy options have a positive relationship with this objective as they both require development to require new buildings, extensions and modifications and small scale alterations and additions, to achieve high standards of amenity. However, the updated policy is reworded to refer to living conditions, the prevailing characteristics of an area, the living conditions of occupants of new development, and the effect of sense of enclosure to existing gardens, balconies and terraces. Therefore the updated policy has a stronger positive relationship with this objective.

6.5.2 Explanation of table CL5

This policy is not changing, and it therefore has no relationship with any of the SA objectives apart from 16. However option 1 has a stronger positive relationship with SA 16 than option 2 as it takes more factors into account when considering living conditions and neighbouring amenity. Therefore this is the preferred option.

6.6 SMALL-SCALE ALTERATIONS AND ADDITIONS

6.6.1 Policy CL6

The Council will require that alterations and additions do not harm the existing character and appearance of the building and its context.

To deliver this the Council will resist small-scale development that:

- a. harms the character or appearance of the existing building, its setting or townscape;
- b. results in a cumulative effect which would be detrimental to the character and appearance of the area;
- c. is not of high quality form, detailed design and materials or is not discreetly located.

Table CL6

SA OBJECTIVE	Option 1	Option 2	COMMENT
1. To conserve and enhance the natural environment and biodiversity.	X	X	There is no correlation between the policy and this SA objective.
2. Reduce crime and anti-social behaviour and the fear of crime.	X	+	The existing policy has a positive relationship with this objective as it resists small scale alterations which do not improve the security of the building in a sensitive manner. The Updated policy does not include this. There are other policies which require development to be secure, and design out crime.
3. To support a diverse and vibrant local economy to foster sustainable economic growth.	X	X	There is no correlation between the policy and this SA objective.
4. Encourage social inclusion, equity, the promotion of equality and a respect for diversity.	+	+	Both the updated and existing policy have a positive relationship with this objective, as they require development to be inclusive and accessible to all.
5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of	X	X	There is no correlation between the policy and this SA objective.

renewables.			
6. Reduce the risk of flooding to current and future residents.	X	X	There is no correlation between the policy and this SA objective.
7. Improve air quality in the Royal Borough.	X	X	There is no correlation between the policy and this SA objective.
8. Protect and enhance the Royal Borough's parks and open spaces.	X	X	There is no correlation between the policy and this SA objective.
9. Reduce pollution of air, water and land.	X	X	There is no correlation between the policy and this SA objective.
9a. Prioritize development on previously developed land.	X	X	There is no correlation between the policy and this SA objective.
10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic.	X	X	There is no correlation between the policy and this SA objective.
11. Reduce the amount of waste produced and maximise the amount of waste that is recycled.	X	X	There is no correlation between the policy and this SA objective.
12. Ensure that social and community uses and facilities which serve a local need are enhanced, protected, and to encourage the provision of new community facilities.	X	X	There is no correlation between the policy and this SA objective.

13. To aim that the housing needs of the Royal Borough's residents are met.	X	X	There is no correlation between the policy and this SA objective.
14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials.	X	X	There is no correlation between the policy and this SA objective.
15. Ensure the provision of accessible health care for all Borough residents.	X	X	There is no correlation between the policy and this SA objective.
16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage.	+	+	Both the updated and existing policy have positive relationships with this objective, as both resist small scale development which harms the character or appearance of the existing building, its setting or townscape.

6.6.2 Explanation of table CL6

Both policies have a positive relationship with SA objectives 4 and 16. However, option 2 has a positive relationship with SA objective 2. Option 1 does not have a relationship with this objective. Although in this instance option 2 has a higher positive score when assessed against the objectives, there are other policies (CL2) which requires development to be secure, and design out crime.

6.7 EXISTING BUILDINGS - ROOF ALTERATIONS/ADDITIONAL STOREYS

6.7.1 Policy CL8

The Council will require roof alterations and additional storeys to be architecturally sympathetic to the age and character of the building and group of buildings.

To deliver this the Council will:

- a. permit additional storeys and roof level alterations where the character of a terrace or group of properties has been severely compromised by a variety of roof extensions and where infilling between them would help to reunite the group;
- b. resist additional storeys, and roof level alterations on:

- i. complete terraces or groups of buildings where the existing roof line is unimpaired by extensions, even when a proposal involves adding to the whole terrace or group as a co-ordinated design;
- ii. buildings or terraces that already have an additional storey or mansard;
- iii. buildings that have a roof structure or form of historic or architectural interest;
- iv. buildings that are higher than surrounding neighbours, or where they would detract from significant skylines or profiles;
- v. buildings or terraces where the roof line or party walls are exposed to long views from public spaces, and where they would have an intrusive impact on that view or would impede the view of an important building or open space beyond;
- vi. buildings that, by the nature of the roof construction and architectural style, are unsuitable for additional storeys, e.g. pitched roofs with eaves;
- vii. mansion blocks of flats where an additional storey would add significantly to the bulk or unbalance the architectural composition;
- viii. terraces that are already broken only by isolated roof additions.

Table CL8

SA OBJECTIVE	Option 1	Option 2	COMMENT
1. To conserve and enhance the natural environment and biodiversity.	X	X	There is no correlation between the policy and this SA objective.
2. Reduce crime and anti-social behaviour and the fear of crime.	X	X	There is no correlation between the policy and this SA objective.
3. To support a diverse and vibrant local economy to foster sustainable economic growth.	X	X	There is no correlation between the policy and this SA objective.
4. Encourage social inclusion, equity, the promotion of equality and a respect for diversity.	X	X	There is no correlation between the policy and this SA objective.
5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables.	X	X	There is no correlation between the policy and this SA objective.
6. Reduce the risk	X	X	There is no correlation between the

of flooding to current and future residents.			policy and this SA objective.
7. Improve air quality in the Royal Borough.	X	X	There is no correlation between the policy and this SA objective.
8. Protect and enhance the Royal Borough's parks and open spaces.	X	X	There is no correlation between the policy and this SA objective.
9. Reduce pollution of air, water and land.	X	X	There is no correlation between the policy and this SA objective.
9a. Prioritize development on previously developed land.	-/?	X	Potential slight relationship between option 1 (the policy CL8) whereby it sets out circumstances where roof additions or extensions will be considered acceptable.
10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic.	X	X	There is no correlation between the policy and this SA objective.
11. Reduce the amount of waste produced and maximise the amount of waste that is recycled.	X	X	There is no correlation between the policy and this SA objective.
12. Ensure that social and community uses and facilities which serve a local need are enhanced, protected, and to encourage the provision of new community facilities.	X	X	There is no correlation between the policy and this SA objective.
13. To aim that the housing needs of the Royal	X	X	There is no correlation between the policy and this SA objective.

Borough's residents are met.			
14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials.	X	X	There is no correlation between the policy and this SA objective.
15. Ensure the provision of accessible health care for all Borough residents.	X	X	There is no correlation between the policy and this SA objective.
16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage.	+	-	Option 1 has a positive relationship with this objective as it seeks to protect the character of buildings and groups of buildings by providing a policy against which to assess proposals for additional stories and roof extensions. Option 2, no policy, has a negative relationship with this objective as it offers no policy framework when assessing proposals which include additional stories or roof extensions.

6.7.2 Explanation of Table CL8

Option 1 has a potentially negative relationship with objective 9a whereby it would restrict development on previously developed land. However, its strong positive relationship with objective 16 outweighs the slight negative relationship with policy 9a. Option 2 has a negative relationship with objective 16 as it would provide no policy framework against which applications for works to roof could be assessed.

6.8 EXISTING BUILDINGS - EXTENSIONS AND MODIFICATIONS

6.8.1 Policy CL9

The Council will require extensions and modifications to existing buildings to be subordinate to the original building, to allow the form of the original building to be clearly understood, and to reinforce the character and integrity of the original building, or group of buildings.

To deliver this the Council will resist proposals for extensions if:

a. the extension would extend rearward beyond the existing general rear building line of any neighbouring extensions;

- b. the extension would rise above the general height of neighbouring and nearby extensions, or rise to or above the original main eaves or parapet;
- c. the extension would spoil or disrupt the even rhythm of rear additions;
- d. the detailed design of the addition, including the location or proportions or dimensions of fenestration or the external materials and finishes, would not be in character with the existing building;
- e. the extension would breach the established front building line;
- f. an important or historic gap or view would be blocked or diminished;
- g. the architectural symmetry of a building, terrace or group of buildings would be impaired;
- h. the original architectural features on a formal flank elevation would be obscured;
- i. access to the rear of the property or of those adjoining would be lost or reduced;
- j. a conservatory is proposed to be located at roof level, significantly above garden level or on a corner site.

Table CL9

SA OBJECTIVE	Option 1	Option 2	COMMENT
1. To conserve and enhance the natural environment and biodiversity.	X	X	There is no correlation between the policy and this SA objective.
2. Reduce crime and anti-social behaviour and the fear of crime.	X	X	There is no correlation between the policy and this SA objective.
3. To support a diverse and vibrant local economy to foster sustainable economic growth.	X	X	There is no correlation between the policy and this SA objective.
4. Encourage social inclusion, equity, the promotion of equality and a respect for diversity.	X	X	There is no correlation between the policy and this SA objective.
5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables.	X	X	There is no correlation between the policy and this SA objective.
6. Reduce the risk of flooding to current and future	X	X	There is no correlation between the policy and this SA objective.

residents.			
7. Improve air quality in the Royal Borough.	X	X	There is no correlation between the policy and this SA objective.
8. Protect and enhance the Royal Borough's parks and open spaces.	X	X	There is no correlation between the policy and this SA objective.
9. Reduce pollution of air, water and land.	X	X	There is no correlation between the policy and this SA objective.
9a. Prioritize development on previously developed land.	-/?	X	Potential slight relationship between option 1 (the policy CL9) whereby it sets out circumstances where extensions and modifications to existing buildings will be either resisted or considered acceptable.
10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic.	X	X	There is no correlation between the policy and this SA objective.
11. Reduce the amount of waste produced and maximise the amount of waste that is recycled.	X	X	There is no correlation between the policy and this SA objective.
12. Ensure that social and community uses and facilities which serve a local need are enhanced, protected, and to encourage the provision of new community facilities.	X	X	There is no correlation between the policy and this SA objective.
13. To aim that the housing needs of the Royal	X	X	There is no correlation between the policy and this SA objective.

Borough's residents are met.			
14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials.	X	X	There is no correlation between the policy and this SA objective.
15. Ensure the provision of accessible health care for all Borough residents.	X	X	There is no correlation between the policy and this SA objective.
16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage.	+	-	Option 1 has a positive relationship with this objective as it seeks to protect the character of buildings and groups of buildings by providing a policy against which to assess proposals for extensions and modifications. Option 2, no policy, has a negative relationship with this objective as it offers no policy framework when assessing proposals which includes extensions and modifications.

6.8.2 Explanation of table CL9

Option 1 has a potentially negative relationship with objective 9a whereby it would restrict development on previously developed land. However, its strong positive relationship with objective 16 outweighs the potentially slight negative relationship with policy 9a. Option 2 has a negative relationship with objective 16 as it would provide no policy framework when assessing proposals which includes extensions and modifications.

6.9 SHOPFRONTS

6.9.1 Policy CL10

The Council will require shopfronts to relate well to the buildings above and to either side to provide an attractive setting for the display of goods and to drive up the quality of the area.

To deliver this the Council will:

- a. require alterations to existing shopfronts to preserve those elements that contribute to their traditional character, such as corbels, part-glazed doors, fascia, glazing bars, pilasters, and stallrisers, awnings and blinds;
- b. require new, and alterations to existing shopfronts, to:

- i. respect the building's original framework;
- ii. have a positive visual impact on the appearance of the building or streetscene;
- iii. respect the character of the building in relation to siting and design of awnings and blinds;
- iv. be inclusive for all;
- v. maintain existing independent access to upper floor accommodation;
- c. require, where shop units are combined, new shopfronts and signage to be installed within the original surrounds and not to obscure them;
- d. resist new shopfronts that would involve the removal of existing separate access to residential accommodation;
- e. resist open shopfronts;
- f. resist external security shutters that have a solid appearance.

TABLE CL10

SA OBJECTIVE	Option 1	Option 2	COMMENT
1. To conserve and enhance the natural environment and biodiversity.	X	X	There is no correlation between the policy and this SA objective.
2. Reduce crime and anti-social behaviour and the fear of crime.	X	X	There is no correlation between the policy and this SA objective.
3. To support a diverse and vibrant local economy to foster sustainable economic growth.	+/?	-/?	Option 1 could have a potential positive relationship with this objective. This option sets out what the council requires when assessing applications which include shopfronts. This may, in some cases, support businesses by having a clear policy that applicants can look at before applying. Option 2 would mean that someone hoping to make an application for changes to a shopfront would have no clear policy direction before making the application which can cause delays to a potential business opening.
4. Encourage social inclusion, equity, the promotion of equality and a respect for diversity.	+	X	There is a positive relationship between the policy and this objective, the policy requires that new and alterations to existing shopfronts are inclusive for all. Option 2 has a negative relationship with this objective as no policy implies no requirement.
5. Minimise effects	X	X	There is no correlation between the

on climate change through reduction in emissions, energy efficiency and use of renewables.			policy and this SA objective.
6. Reduce the risk of flooding to current and future residents.	X	X	There is no correlation between the policy and this SA objective.
7. Improve air quality in the Royal Borough.	X	X	There is no correlation between the policy and this SA objective.
8. Protect and enhance the Royal Borough's parks and open spaces.	X	X	There is no correlation between the policy and this SA objective.
9. Reduce pollution of air, water and land.	X	X	There is no correlation between the policy and this SA objective.
9a. Prioritize development on previously developed land.	X	X	There is no correlation between the policy and this SA objective.
10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic.	X	X	There is no correlation between the policy and this SA objective.
11. Reduce the amount of waste produced and maximise the amount of waste that is recycled.	X	X	There is no correlation between the policy and this SA objective.
12. Ensure that social and community uses and facilities which serve a local need are enhanced, protected, and to	X	X	There is no correlation between the policy and this SA objective.

encourage the provision of new community facilities.			
13. To aim that the housing needs of the Royal Borough's residents are met.	X	X	There is no correlation between the policy and this SA objective.
14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials.	X	X	There is no correlation between the policy and this SA objective.
15. Ensure the provision of accessible health care for all Borough residents.	X	X	There is no correlation between the policy and this SA objective.
16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage.	+	-	Option 1 has a positive relationship with this objective as it seeks to protect the character of buildings and groups of buildings by providing a policy against which to assess proposals for shopfronts within this context. Option 2, no policy, has a negative relationship with this objective as it offers no policy framework when assessing such proposals.

6.9.2 Explanation of table CL10

Both options have a potential relationship with SA objective 3. Option 1 could have a potential positive relationship with this objective. This option sets out what the council requires when assessing applications which include shopfronts. This may, in some cases, support businesses by having a clear policy that applicants can look at before applying. Option 2 would mean that someone hoping to make an application for changes to a shopfront would have no clear policy direction before making the application which can cause delays to a potential business opening.

Option 1 has a positive relationship with SA 16 and option 2 has a negative relationship with this objective. Therefore option 1 has more of a positive relationship with the SA objectives and is preferred.

6.10 CL11 VIEWS

6.10.1 Policy CL11

The Council will require all development to protect and enhance views, vistas gaps and the skyline that contribute to the character and quality of the area.

To deliver this the Council will:

- a. resist development which interrupts, disrupts or detracts from strategic and local vistas, views, and gaps and the skyline;
- b. require developments whose visual impacts extend beyond that of the immediate street, to demonstrate how views are protected or enhanced;
- c. require, within conservation areas, development to preserve or enhance views:
 - i. identified in conservation area appraisals;
 - ii generally within, into, and out of conservation areas, including the rear of properties;
 - iii that affect the setting of and from development on sites adjacent to conservation areas and listed buildings;
- d. require development to respect the setting of a landmark, taking care not to create intrusive elements in its foreground, middle ground or background.

Table CL11

SA OBJECTIVE	Option 1	Option 2	COMMENT
1. To conserve and enhance the natural environment and biodiversity.	X	X	There is no correlation between the policy and this SA objective.
2. Reduce crime and anti-social behaviour and the fear of crime.	X	X	There is no correlation between the policy and this SA objective.
3. To support a diverse and vibrant local economy to foster sustainable economic growth.	X	X	There is no correlation between the policy and this SA objective.
4. Encourage social inclusion, equity, the promotion of equality and a respect for diversity.	X	X	There is no correlation between the policy and this SA objective.
5. Minimise effects on climate change through reduction	X	X	There is no correlation between the policy and this SA objective.

in emissions, energy efficiency and use of renewables.			
6. Reduce the risk of flooding to current and future residents.	X	X	There is no correlation between the policy and this SA objective.
7. Improve air quality in the Royal Borough.	X	X	There is no correlation between the policy and this SA objective.
8. Protect and enhance the Royal Borough's parks and open spaces.	X	X	There is no correlation between the policy and this SA objective.
9. Reduce pollution of air, water and land.	X	X	There is no correlation between the policy and this SA objective.
9a. Prioritize development on previously developed land.	X	X	There is no correlation between the policy and this SA objective.
10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic.	X	X	There is no correlation between the policy and this SA objective.
11. Reduce the amount of waste produced and maximise the amount of waste that is recycled.	X	X	There is no correlation between the policy and this SA objective.
12. Ensure that social and community uses and facilities which serve a local need are enhanced, protected, and to encourage the provision of new community	X	X	There is no correlation between the policy and this SA objective.

facilities.			
13. To aim that the housing needs of the Royal Borough's residents are met.	X	X	There is no correlation between the policy and this SA objective.
14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials.	X	X	There is no correlation between the policy and this SA objective.
15. Ensure the provision of accessible health care for all Borough residents.	X	X	There is no correlation between the policy and this SA objective.
16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage.	+	-	Option 1 has a positive relationship with this objective as it requires all development to protect and enhance views, vista gaps and the skyline that contribute to the character and quality of an area. Option 2 (no policy) has a negative relationship with this objective as it implies that the council does not have a policy to protect views and therefore exposes such views to potentially harmful development.

6.10.2 Explanation of table CL11

The only relationship here is with objective 16, where option 1 has a positive relationship and option 2 a negative relationship (explained in table above). Therefore option 1 is preferred.

6.11 BUILDING HEIGHTS

6.11.1 Policy CL12

The Council will require new buildings to respect the setting of the Borough's valued townscapes and landscapes, through appropriate building heights.

To deliver this the Council will:

- a. require proposals to strengthen our traditional townscape in terms of building heights and roofscape by requiring developments to:
 - i. reflect the prevailing building heights within the context;

- ii. provide, for larger developments, a roofscape that reflects that of the context of the site;
- iii. seldom use height to express local landmarks so the prevailing building height is maintained;
- b. resist buildings significantly taller than the surrounding townscape other than in exceptionally rare circumstances, where the development has a wholly positive impact on the character and quality of the townscape;
- c. require full planning applications for any building that exceeds the prevailing building height within the context.

Table CL12

SA OBJECTIVE	Option 1	Option 2	COMMENT
1. To conserve and enhance the natural environment and biodiversity.	X	X	There is no correlation between the policy and this SA objective.
2. Reduce crime and anti-social behaviour and the fear of crime.	X	X	There is no correlation between the policy and this SA objective.
3. To support a diverse and vibrant local economy to foster sustainable economic growth.	X	X	There is no correlation between the policy and this SA objective.
4. Encourage social inclusion, equity, the promotion of equality and a respect for diversity.	X	X	There is no correlation between the policy and this SA objective.
5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables.	X	X	There is no correlation between the policy and this SA objective.
6. Reduce the risk of flooding to current and future residents.	X	X	There is no correlation between the policy and this SA objective.
7. Improve air quality in the Royal Borough.	X	X	There is no correlation between the policy and this SA objective.

8. Protect and enhance the Royal Borough's parks and open spaces.	X	X	There is no correlation between the policy and this SA objective.
9. Reduce pollution of air, water and land.	X	X	There is no correlation between the policy and this SA objective.
9a. Prioritize development on previously developed land.	X	X	There is no correlation between the policy and this SA objective.
10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic.	X	X	There is no correlation between the policy and this SA objective.
11. Reduce the amount of waste produced and maximise the amount of waste that is recycled.	X	X	There is no correlation between the policy and this SA objective.
12. Ensure that social and community uses and facilities which serve a local need are enhanced, protected, and to encourage the provision of new community facilities.	X	X	There is no correlation between the policy and this SA objective.
13. To aim that the housing needs of the Royal Borough's residents are met.	X	X	There is no correlation between the policy and this SA objective.
14. Encourage energy efficiency through building design to maximise	X	X	There is no correlation between the policy and this SA objective.

the re-use of buildings and the recycling of building materials.			
15. Ensure the provision of accessible health care for all Borough residents.	X	X	There is no correlation between the policy and this SA objective.
16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage.	+	-	Option 1 has a positive relationship with this objective as it requires new buildings to respect the setting of the Borough's valued townscapes and landscapes through appropriate buildings heights and sets out a number of criteria. Option 2 (no policy) has a negative relationship with this objective as it implies that the council does not have a policy to for building heights and therefore exposes the valued townscapes to potentially harmful development.

6.11.2 Explanation of table CL11

The only relationship here is with objective 16, where option 1 has a positive relationship and option 2 a negative relationship (explained in table above). Therefore option 1 is preferred.

7.0 AN ENGAGING PUBLIC REALM

7.1 Streetscape

7.1.1 Policy CR4

The Council will require improvements to the visual, functional and inclusive quality of our streets, ensuring they are designed and maintained to a very high standard, that street clutter is removed **and that street furniture, advertisements and signs are kept to a reasonable minimum to support the Council's aim of driving up the quality of the Borough's streetscape.**

To deliver this the Council will:

- a. require all work to, or affecting, the public highway, to be carried out in accordance with the Council's Streetscape Guidance;
- b. require all redundant or non-essential street furniture to be removed;
- c. retain, and seek the maintenance and repair of, historic street furniture such as post boxes, and historic telephone kiosks, where this does not adversely impact on the safe functioning of the street;

- d. require that where there is an exceptional need for new street furniture that it is of high quality design and construction, and placed with great care, so as to relate well to the character and function of the street;
- e. resist adverts that by reason of size, siting, design, materials or method of illumination, including on street furniture that harms amenity or public or road safety;
- f. resist freestanding structures such as telephone kiosks where the function for the display of adverts over dominates the primary purpose for the structure, whether sited on streets, forecourts or roadsides;
- g. resist pavement crossovers and forecourt parking;
- h. require all major development to provide new public art that is of high quality and either incorporated into the external design of the new building or carefully located within the public realm.

Table CR4

SA OBJECTIVE	Option 1	Option 2	COMMENT
1. To conserve and enhance the natural environment and biodiversity.	X	X	There is no correlation between the policy and this SA objective.
2. Reduce crime and anti-social behaviour and the fear of crime.	X	X	There is no correlation between the policy and this SA objective.
3. To support a diverse and vibrant local economy to foster sustainable economic growth.	x/-	X/+	Option 1 could have a potentially negative relationship with this policy objective as advertisements are seen as necessary for promotion of business. Option 2 would have a potentially positive relationship with the objective, as no policy would be in place to specifically resist inappropriate advertising.
4. Encourage social inclusion, equity, the promotion of equality and a respect for diversity.	X	X	There is no correlation between the policy and this SA objective.
5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables.	X	X	There is no correlation between the policy and this SA objective.

6. Reduce the risk of flooding to current and future residents.	X	X	There is no correlation between the policy and this SA objective.
7. Improve air quality in the Royal Borough.	X	X	There is no correlation between the policy and this SA objective.
8. Protect and enhance the Royal Borough's parks and open spaces.	X	X	There is no correlation between the policy and this SA objective.
9. Reduce pollution of air, water and land.	X	X	There is no correlation between the policy and this SA objective.
9a. Prioritize development on previously developed land.	X	X	There is no correlation between the policy and this SA objective.
10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic.	+	+	Both options resist street clutter which enhances pedestrian facilities and may encourage walking as a mode of transport.
11. Reduce the amount of waste produced and maximise the amount of waste that is recycled.	X	X	There is no correlation between the policy and this SA objective.
12. Ensure that social and community uses and facilities which serve a local need are enhanced, protected, and to encourage the provision of new community facilities.	X	X	There is no correlation between the policy and this SA objective.
13. To aim that the housing needs of	X	X	There is no correlation between the policy and this SA objective.

the Royal Borough's residents are met.			
14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials.	X	X	There is no correlation between the policy and this SA objective.
15. Ensure the provision of accessible health care for all Borough residents.	X	X	There is no correlation between the policy and this SA objective.
16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage.	+	-	The amended policy includes specific reference to advertisements and where they are not appropriate thus reinforcing local distinctiveness and the streetscape as a whole. Without this update, the existing policy position is weak and may leave streetscapes vulnerable to street clutter and advertisements structures.

7.1.2 Explanation of table CR4

There is a potentially negative relationship between option 1 and SA objective 3. The amended policy resists adverts which harm amenity or public and road safety, and telephone or freestanding structures where the function for the display of adverts over dominates the primary function of the structure. Hence the potential for a negative relationship with this policy objective as advertisements are seen as necessary for promotion of business. Option 2 would have a potentially positive relationship with the objective, as no policy would be in place to specifically resist inappropriate advertising.

7.1.3 Both have a positive relationship with SA 10 as both resist street clutter which enhances pedestrian facilities and may encourage walking as a mode of transport.

7.1.4 Option 2 has a positive relationship with SA 16 as it provides a policy framework with which inappropriate advertisements and other clutter can be resisted, and the local distinctiveness of the streetscape as a whole can be protected. Option 1 has a negative relationship with this objective.

7.2 Parks, Gardens, Open Spaces and Waterways

7.2.1 Policy CR5

The Council will protect, enhance and make the most of existing parks, gardens, open spaces and waterways, and require new high quality outdoor spaces to be provided.

To deliver this the Council will, in relation to:

Parks, Gardens and Open Spaces

a. resist the loss of existing:

i. Metropolitan Open Land;

ii. public open space;

iii. private communal open space and private open space where the space contributes to the character and appearance of the area;

b. resist development that has an adverse effect upon the environmental and open character, appearance and function of **Conservation Areas**, Metropolitan Open Land or sites which are listed within the Register of Parks and Gardens of Special Historic Interest in England, or their setting;

c. resist development that has an adverse effect on garden squares, including proposals for basements;

d. require all major development outside a 400m radius of the closest entrance to the nearest public open space to make provision for new open space which is suitable for a range of outdoor activities for users of all ages, which may be in the form of communal garden space. Where this is not possible for justified townscape reasons, that a s106 contribution is made towards improving existing publicly accessible open space;

e. require all major residential developments to provide on-site external play space, including for under-fives, based on expected child occupancy;

f. require all green open space to optimise biodiversity and wildlife habitat

g. protect the open spaces surrounding the Royal Hospital from inappropriate development both in the landscaped areas themselves and in the neighbouring streets;

Waterways

h. require opportunities to be taken to improve public access to, and along the Thames and the Grand Union Canal, and promote their use for education, tourism, leisure and recreation, health, well-being and transport;

i. resist permanently moored vessels on the River, except where they would not have:

i. a detrimental effect on the special character, including biodiversity, of the river;

ii. an adverse affect on the character or appearance of the existing residential moorings at Battersea Reach;

j. permit residential moorings on the Grand Union Canal provided that:

i. there are adequate services for permanently moored vessels;

a. ii. other canal users (both water and land-based) are not adversely affected.

Table CR5

SA OBJECTIVE	Option 1	Option 2	COMMENT
1. To conserve and enhance the natural environment and biodiversity.	++	+	Both options have a positive impact on this objective. Option 2 is slightly stronger.
2. Reduce crime and anti-social behaviour and the fear of crime.	X	X	There is no correlation between the policy and this SA objective.
3. To support a diverse and vibrant local economy to foster sustainable economic growth.	X	X	There is no correlation between the policy and this SA objective.
4. Encourage social inclusion, equity, the promotion of equality and a respect for diversity.	X	X	There is no correlation between the policy and this SA objective.
5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables.	X	X	There is no correlation between the policy and this SA objective.
6. Reduce the risk of flooding to	X	X	There is no correlation between the policy and this SA objective.

current and future residents.			
7. Improve air quality in the Royal Borough.	X	X	There is no correlation between the policy and this SA objective.
8. Protect and enhance the Royal Borough's parks and open spaces.	X	X	There is no correlation between the policy and this SA objective.
9. Reduce pollution of air, water and land.	X	X	There is no correlation between the policy and this SA objective.
9a. Prioritize development on previously developed land.	X	X	There is no correlation between the policy and this SA objective.
10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic.	X	X	There is no correlation between the policy and this SA objective.
11. Reduce the amount of waste produced and maximise the amount of waste that is recycled.	X	X	There is no correlation between the policy and this SA objective.
12. Ensure that social and community uses and facilities which serve a local need are enhanced, protected, and to encourage the provision of new community facilities.	X	X	There is no correlation between the policy and this SA objective.
13. To aim that the housing needs of the Royal Borough's	X	X	There is no correlation between the policy and this SA objective.

residents are met.			
14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials.	X	X	There is no correlation between the policy and this SA objective.
15. Ensure the provision of accessible health care for all Borough residents.	X	X	There is no correlation between the policy and this SA objective.
16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage.	X	X	There is no correlation between the policy and this SA objective.

7.2.2 Explanation of table CR5.

Option 1 has a stronger positive relationship with SA objective 1 and therefore is the preferred option in this instance.

7.3 Trees and Landscape

7.3.1 Policy CR 6 is not changing and as such an SA is not required for this policy.

8.0 Preferred option

8.1 The strategic objective for *Renewing the Legacy* “is not simply to ensure no diminution in the excellence we have inherited, but to pass to the next generation a Borough that is better than today, of the highest quality and inclusive for all, by taking great care to maintain, conserve and enhance the glorious built heritage we have inherited and to ensure that where new development takes place it enhances the Borough”. The strategic objective for *An Engaging Public Realm* is to “endow a strong local sense of place by maintaining and extending our excellent public realm to all parts of the Borough”.

To ensure that the policies can deliver these strategic objectives, it is necessary to carry forward existing UDP policies, which have a strong focus on conservation and design. To this end, the adoption of Option 1 in each instance is recommended as the preferred option. No significant negative impacts should arise as a consequence of incorporating these policies into the CS/Local Plan.

- 8.2** These policies have a predominantly positive relationship with the SA objectives. The appraisal process has not suggested that any of the preferred policies are likely to have any significant negative effect on the SA objectives.

9.0 Mitigation and Monitoring

- 9.1** The significant sustainability effects of implementing the policy must be monitored to identify unforeseen adverse effects and to be able to undertake appropriate remedial action (SEA Directive).
- 9.2** A monitoring framework was developed for the LDF as a whole but sufficient information about the effects of the above policies needs to be provided for.
- 9.3** It is difficult to quantify the success that the Council has had in ensuring that development that has occurred in the Borough over the study period has ‘renewed the legacy’. There are no easy ‘ready made’ ‘quality of design’ indicators closely applicable in the Borough. The design assessment considers policy usage, or new designations as a proxy for high quality design, but these have to be supplemented by a range of qualitative assessments.

Table 9: Proposed Monitoring Data

INDICATORS
The Architectural Appraisal Panel (AAP)
Architectural and design awards
Renewal of Conservation Area Proposal Statements
Number of applications refused on design grounds and the outcome of any appeals.
New conservation areas/ extensions
Buildings at risk register
New listings

- 12.4** In terms of mitigation measures, the only potential negative relationship exists between two of the policies and the SA objective for economic growth. This negative relationship is not considered significantly strong and as such the potential long term impact is expected to be negligible. In any case, it should be noted that the core

strategy contains other policies which promote economic growth and their long term positive impact would outweigh the negative in this situation.

10.0 Conclusions

- 10.1 The preferred Option 1 in each case will successfully bring all of the relevant policies into a single document (and ultimately allow for the deletion of the entire UDP) along with a number of minor changes which are intended to bring the supporting text up to date. In addition, the Core Policies have been amended to reflect the thrust within the NPPF to support economic growth and to correct the original omission of a strategic policy linked to the Borough's central vision.
- 10.2 It should be noted that these amendments are not intended to alter the meaning of the UDP policies, nor the meaning of the plan taken as a whole.
- 10.3 It is concluded that this opportunity to appraise the extant policies before incorporating them into the Local Plan has been an effective way of fulfilling the legislative requirements and ensuring they will continue to be effective alongside the CS policies throughout the lifetime of the Local Plan.