

Planning and Borough Development

Kensington Town Hall, Hornton Street, LONDON, W8 7NX

Executive Director Planning and Borough Development

Mr Jonathan Bore

My reference: Environmental Assessment
Screening decision for Silchester Garages SPD
Please ask for: Patricia Cuervo

14 December 2010

Please ask for: Jonathan Bore

Dear Sir or Madam,

In accordance with Environmental Assessment of Plans and Programmes Regulations 2004 we have consulted the statutory consultees to determine whether or not the Silchester Garages SPD was likely to have significant environmental effects and therefore whether a strategic environmental assessment (SEA) was required.

The purpose of the Silchester Garages SPD is to provide site-specific design and planning guidance for future development at the Silchester Garage Site and its surroundings. Having considered the requirements of the Regulations (in particular, the criteria set out in Schedule 1 of the 2004 Regulations) and the responses received from the consultation bodies¹, the Council's view is that an SEA is not required in this

¹ EA's response: There are no major environmental constraints at this site that would cause us concern. As you identify in paragraph 4.3 page 24, there are no identified flood risk areas in the vicinity of the site. Although the site is located outside the medium to high risk flood zones any development would still need to consider the impact on surface water flood risk and include sufficient measures to reduce the risk of increasing runoff. Including reference to the requirement for Sustainable Drainage Systems in this document would be a helpful way of promoting sustainable drainage to reduce the risk of increasing surface water runoff.

The London Borough of Kensington & Chelsea sits within an area of 'serious' water stress. This means there is a high population with high water demands and limited water availability – it does not reflect water companies ability to supply water. In fact there is less water available per person in the South East than Sudan or Syria. Average water use in the London Borough of Kensington & Chelsea is 160 l/h/d which is above the England and Wales average of 148l/h/d (average consumption for 2008-09). Therefore there is a case for promoting water efficiency in this document for both residential and non-residential developments.

Under General Development Standards (page 64), supplementary policy SP31, it is positive that one of the standards is for Code for Sustainable Homes level 4. However, we think some standards should be added for including Sustainable Drainage Systems (SUDs) and water efficiency.

For **water efficiency** we recommend a standard of achieving 105 l/h/d which would save 79 kilograms of CO₂ and 15 cubic meters of water per year, per house, over and above building regulations (125l/h/d). This is supported by the London Plan policies (currently 4A.16 Water supplies and resources, replacement policy 5.15 Water use and supplies). Non-households consume significant amounts of water. In London non-households accounts for 29 percent of water consumption (Draft London water strategy, GLA, 2009) and is therefore an area where further water and carbon savings can be made. London's draft water strategy notes that 'commercial water efficiency has a significant potential to save water'. We therefore recommend that new non-household development, including refurbishments, achieve a water efficiency standard, such as BREEAM (BRE Environmental Assessment Method) 'Excellent' with maximum number of 'water credits.' BREEAM (BRE Environmental Assessment Method) is the leading and most widely used environmental assessment method for buildings.

Direct Line: 020 7361 2605

Fax: 020 7361 3463

Email: patricia.cuervo@rbkc.gov.uk

Web: www.rbkc.gov.uk

instance. It is likely however that any planning application for the development proposed by the SPD will be an application for which an environmental impact assessment will be required in accordance with the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999.

The Council is required to inform your organisation about this decision. The statement of reasons is attached. Please let me know if you have any queries in connection with the above. If you have any comments I would be grateful if you could contact the officer Patricia Cuervo directly by the 10th of January.

Yours sincerely,



Jonathan Bore
Executive Director

STATEMENT OF REASONS

The draft Silchester Garages Supplementary Planning Document (“the SPD”) is a plan or programme as described by regulation 5(6) of the Environmental Assessment of Plans and Programmes Regulations 2004 (“the Regulations”) i.e. it applies to small area at local level. The Council has determined that the SPD is not likely to have significant environmental effects, having taken into account the requirements of the Regulations (in particular the criteria set out in Schedule 1 of the Regulations) and the responses received from the consultation bodies and therefore that an SEA is not required for the SPD.. The Council reached the above conclusion for the following reasons:

- The SPD is a framework for site-specific design and planning guidance for future development at the Silchester Garage Site and its surroundings but it does not influence other plans and programmes;

Note

- The planning application for the whole development proposed by the SPD is likely require an environmental impact assessment in accordance with the Town and Country Planning (Environmental Impact Assessment)(England and Wales) Regulations 1999 and therefore, the environmental issues relevant to the development will be addressed at the EIA stage. In particular the EIA will cover the probability, duration, frequency and reversibility of the effects, the cumulative nature of the effects, the transboundary nature of the effects; the risks to human health or the environment, the effects on areas or landscapes which have a recognised national, Community or international protection status, and the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected and the value and vulnerability of the area likely to be affected due to:
 - special natural characteristics or cultural heritage;
 - exceeded environmental quality standards or limit values; or
 - intensive land-use.

For **surface water runoff**, the standard for achieving a reduction in runoff is to greenfield runoff rates which is supported by the London Plan. Support for requiring SuDs in new developments to reduce runoff is in your Core Strategy policy CE2 'Flooding.'
Material and information to be submitted - page 78

A proposal for a development site one hectare or more in size in flood zone 1 would require a Flood Risk Assessment to focus on the management of surface water run-off. Part A and B of the site combined equates to 1.9 hectares so it would be worth adding the requirement for an FRA onto the list on page 78 so potential developers are aware of it.