

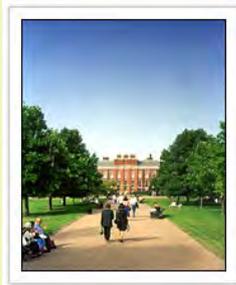


THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA



Core Strategy with a focus on North Kensington Sustainability Appraisal Report

Prepared for the Royal Borough of Kensington and Chelsea



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July 2009

Revision Schedule

Core Strategy with a focus on North Kensington SA Report July 2009

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1 Introduction

1.1.1 Scott Wilson was commissioned by the Royal Borough of Kensington and Chelsea ('the Council') to undertake an independent **Sustainability Appraisal (SA)** of the Borough's pre-submission version Core Strategy. SA seeks to identify the economic, social and environmental impacts of a plan and suggests ways to avoid or minimise negative impacts and maximise positive ones. The Council has undergone a number of stages of plan preparation to date, and Scott Wilson has worked alongside the Council in formal and informal ways to ensure sustainability considerations have been to the fore as they have considered different 'ways forward' (options). This report sets out the findings of the SA of the 'pre-submission' version of the Core Strategy, known as the **Core Strategy with a focus on North Kensington**.

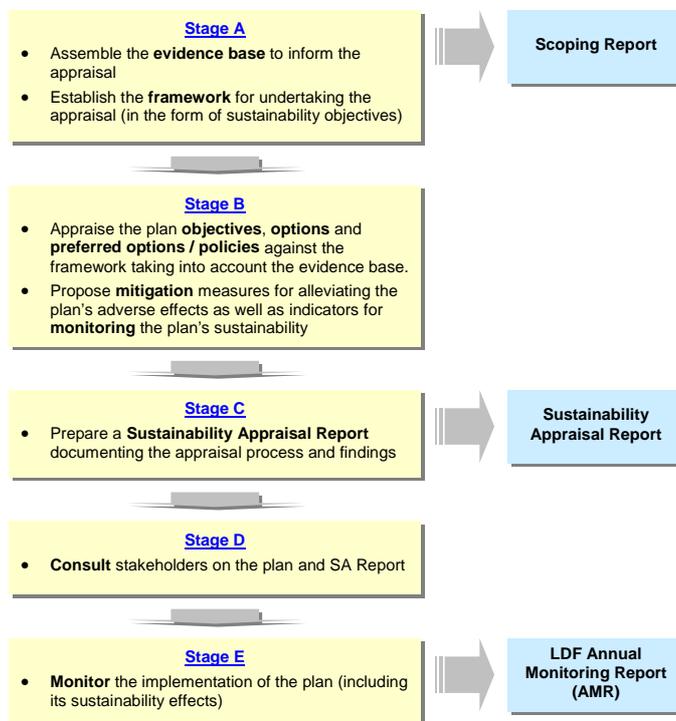
1.2 SEA/SA

1.2.1 Strategic Environmental Assessment (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). A LDF is a folder of Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs) that together outline the approach to planning that will be followed within a local authority (e.g. Royal Borough of Kensington and Chelsea) area.

1.2.2 The Government's approach is to incorporate the requirements of the SEA Directive into a wider process that considers economic and social as well as environmental effects. This combined process is known as 'Sustainability Appraisal (SA)'. Under the Planning and Compulsory Purchase Act 2004 (enacted through the Town and Country Planning Regulations, 2008), 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. In November 2005, the Government published guidance – which Scott Wilson adhere to - on undertaking SA of LDFs incorporating the requirements of the SEA Directive ('the Guidance').

1.2.3 The Guidance advocates a five-stage approach to undertaking SA (see **Figure 1**). Stage A of the process has been carried out, with the Scoping Report being published in June 2005 and a SA Update Report incorporating an update to Stage A produced in February 2009.

Figure 1: The five stage approach to SA



1.3 This Report

1.3.1 This main aim of this report is to document Stage B of the SA process. In doing so it fulfils the requirements of Stage C.

1.3.2 Stage B of the SA process involves the main body of appraisal work and consists of five key tasks:

- B1** – Testing the DPD Objectives against the SA Framework;
- B2** – Developing and refining options;
- B3** – Predicting and assessing effects;
- B4** – Identifying mitigation measures; and
- B5** – Developing monitoring proposals.

1.3.3 Stage B has been an iterative process. The Council first developed options for the Core Strategy for public consultation in November 2005. At this stage an Interim SA Report was published to accompany the Core Strategy Issues and Options document at formal consultation.

1.3.4 Site Specific Allocations were consulted on in June 2006, as was an Interim SA Report.

1.3.5 The North Kensington Area Action Plan options were accompanied by an Interim SA Report for consultation in February 2008. At this time the Council also consulted on second set of options in the Core Strategy Interim Issues and Options.

- 1.3.6 Following this, the Council developed a "Towards Preferred Options" document that brought together the Core Strategy and the North Kensington Area Action Plan. This document underwent public consultation between July and October 2008.
- 1.3.7 In February 2009 a SA Update Report was produced that looked to identify how the SA so far had influenced the preparation of the plan. It also provided an update to the Scoping Report that was prepared in 2005 and reported any suggested changes to the SA framework to undertake the appraisal of the combined plan. This document was made available to stakeholders for comment.
- 1.3.8 Scott Wilson was presented with an early draft of the submission plan in May 2009, at which point a high level appraisal and 'SA Commentary' was prepared. This Report considered the sustainability implications of the emerging strategic policies. It was thought that there were benefits of undertaking this appraisal of the strategic policies at an early stage to assist the Council as they finalised the strategic policies. In June 2009 a further more detailed appraisal and 'SA Commentary' were prepared for the strategic objectives; strategic sites; places and strategic policies prior to finalisation of the plan. The Council have now finalised the Core Strategy with a focus on North Kensington.
- 1.3.9 This **Pre-submission SA Report** documents the appraisal of the Pre-submission Core Strategy.
- 1.3.10 **Figure 2** shows the points at which Scott Wilson has provided SA Input.

Figure 2: History of the SA work undertaken for the Core Strategy with a focus on North Kensington



- 1.3.11 The remainder of this SA Report is structured as follows:
- Chapter 2 -** Sets out a summary of **Stage A** of the SA Process
 - Chapter 3 -** Further introduces the Pre-submission DPD and how **SA Stage B2** has been approached
 - Chapter 4 -** Describes the appraisal methodology
 - Chapter 5 -** Summarises the main appraisal and includes recommendations and mitigation measures (**SA Stages B3 and B4**)
 - Chapter 6 -** Makes conclusions regarding the findings of the appraisal and sets out monitoring proposals (**SA Stage B5**) that should be considered by the Council.
 - Chapter 7 -** Sets out the next steps in the SA / plan-making process.
 - Appendices -** Set out the detailed appraisal findings

Meeting the requirements of the SEA Directive

1.3.12 The SEA Directive sets out certain procedural elements that must be followed. 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 the information that must be included in the Environmental Report. An SEA roadmap, demonstrating how this report conforms to the Directive is shown in **Table 1**. In order to retain clarity, the stages of the process that address the requirements of the SEA Directive are also clearly highlighted in boxes where necessary. Furthermore, an SEA/SA checklist is included as **Appendix 1**.

Table 1: SEA road map

Environmental Report requirements ¹	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>Chapters 1, 2 and 3</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>Chapter 2</i>
(c) the environmental characteristics of areas likely to be significantly affected;	<i>Chapter 2</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>Chapter 2</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>Chapter 2</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>Chapters 5 and 6</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>Chapters 5 and 6</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>Chapters 3 and 4</i>
(i) a description of the measures envisaged concerning monitoring in accordance with Article 10;	<i>Chapter 6</i>
(j) a non-technical summary of the information provided under the above headings.	<i>Non-technical Summary (separate volume)</i>

¹ 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)

2 Stage A Findings

2.1 Introduction

2.1.1 Stage A of the SA process involved gathering evidence regarding the sustainability baseline and sustainability context in the Royal Borough of Kensington and Chelsea (RBKC). This evidence is also available to inform the subsequent appraisal of the LDF. In particular, from the consideration of evidence emerged a number of key sustainability objectives for Kensington and Chelsea. These objectives are the key benchmarks against which the sustainability effects of the LDF can be assessed. Together, the objectives can be considered to be the 'framework' for the appraisal. The **framework and evidence base** for the SA of the LDF are documented in a **Scoping Report**, which was published in September 2005 and the SA Update Report prepared in February 2009. A brief overview of the key findings from the Scoping Report and SA Update Report is presented below. This includes a brief summary of the sustainability implications of further evidence that has become available since the publication of the Scoping Report.

2.2 A1 – The sustainability context

2.2.1 Task A1 of the scoping process involves establishing the sustainability context that should influence LDF preparation, i.e. the other policies, plans, programmes, strategies and initiatives that identify sustainability opportunities and challenges of relevance to the LDF. Establishing the sustainability context helps to identify sustainability issues in the RBKC (see SA Task A3 below).

2.2.2 The requirement to undertake review of the sustainability context arises from the SEA Directive:

The 'Environmental Report' required under the SEA Directive should include:

"an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes"

and

"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"

(Annex 1(a) and (e))

2.2.3 Some of the key messages to emerge from the review are set out in **Table 2**.

Table 2: Key messages for the LDF identified in the Scoping Report

The LDF should seek to...
Environment
<p>Biodiversity & Open Space Conserve and enhance biodiversity. In particular, the protection of all statutory nature conservation sites as well as focusing on biodiversity in the wider environment, connectivity and the provision of new habitats. Promote the conservation of biodiversity <i>and</i> the <i>enhancement</i> of biodiversity conservation. Protect open space and sports and recreational facilities of high quality / value to the local community. Consider the Borough's Environmental Policy Statement Objectives. Reflect the 7 strategic objectives in the Borough's Tree Strategy.</p> <p>Townscape Promote good design.</p> <p>Air Quality and Pollution Where appropriate, invoke the 'precautionary principle' in relation to potentially polluting development. Locate businesses in appropriate areas to service their transport needs and away from areas sensitive to any types of pollution impact. Reduce pollutant emissions and enhance air, land and water quality. Permit potentially noise generating developments provided that they are in appropriate areas to limit impacts on sensitive receptors. Include policies and objectives with the aim of improving air quality and allocating development according to its effect on air quality. Acknowledge the targets that need to be met as part of the AQMP and the national targets. Policies should reflect the sources of Air Pollution (motor vehicles, commercial and residential energy uses) and make attempts to address these in future developments and any existing areas within the Borough.</p> <p>Land and Waste Options will need to be identified for the disposal, minimisation and treatment of waste. Reuse urban land and buildings. Despite constraints, waste management and disposal is a key area where the Borough can improve.</p> <p>Climate Change and Flooding Develop renewable energy sources and where possible, incorporate renewable energy projects in new developments. Endeavour to reduce greenhouse gas emissions and adapt to climate changes already underway. Promote more sustainable drainage systems where appropriate. Development should not be provided in areas at high risk from flooding.</p> <p>Cultural Heritage Preserve and enhance the Royal Borough's unique and rich cultural heritage including Conservation Areas, Listed Buildings and sites of Archaeological value. Promote good design.</p>

Economy
<p>Economy and Employment</p> <p>Where possible, promote 'win-win-win solutions' that advance economic, social and environmental concerns. In some instances trade-offs between competing objectives may be necessary.</p> <p>Enhance consumer choice.</p> <p>Upgrade tourism facilities, promote diversity and reduce seasonality, and ensure that tourist activity is not detrimental to residential amenity.</p> <p>Use existing cultural and historical attributes to encourage sustainable forms of tourism.</p> <p>Introduce policies that reflect the economic characteristics of the Borough.</p> <p>Transport</p> <p>Concentrate major trip generators where there is a choice of means of transport other than the car.</p> <p>Reduce car dependence by facilitating more walking and cycling and improving public transport linkages</p>
Community
<p>Housing</p> <p>Create mixed communities.</p> <p>Avoid developments with <30 dwellings per hectare.</p> <p>Ensure that "Affordable housing and public transport improvements should generally be given the highest importance" with priority also given to other areas such as "learning and skills and health facilities and services and childcare provisions".</p> <p>Use the Borough's Housing Strategy key principles in creating policy.</p> <p>Despite the high house prices within the Borough, ensure the needs of the Borough in terms of affordable housing are accommodated.</p> <p>Ensure that the underlying causes of housing problems are address and suggest suitable mitigation where needed being mindful of the character of the area. Additionally, the bigger picture of housing in West London should be included.</p> <p>Health, Crime and Social Equity</p> <p>Include a robust and realistic monitoring framework, carrying out adequate consultation with consultation bodies and stakeholders. This also relevant to the SA.</p> <p>Regenerate deprived areas.</p> <p>Promote social inclusion.</p> <p>Fulfil residents "wants" in each sector covered by the Borough's Future of Our Community document.</p> <p>Concentrate on crime sectors that are highlighted as priorities, and should aim to reduce anti-social behaviour as well as other forms of crime in accordance with the Community Safety Strategy.</p>

More recent policy context

- 2.2.4 The policy evidence base has been added to considerably since the publication of the Scoping Report in September 2005. Summarised in **Table 3** are some of the key implications from recent policy documents reviewed in the SA Update Report.

Table 3: Implications of post September 2005 policy context

Habitats Directive (92/43/EEC) – update to UK ‘The Conservation (Natural Habitats, &c) (Amendment) Regulations(2007)
The amended Regulations transpose into English law the requirement to carry out a Habitats Regulations Assessment (HRA) / Appropriate Assessment (AA) for land use plans including Local Development Documents (LDDs), such as Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs).
European Landscape Convention (2000)
The convention aims to promote landscape protection, management and creation, and to organise European co-operation on landscape issues. It also encourages the integration of landscape into relevant areas of policy. Specific measures of the convention include: raising awareness of the value of landscapes; promoting landscape training and education; active participation of stakeholders; and setting objectives for landscape quality.
PPS1 Supplement: Planning and Climate Change (2007)
Local Planning Authorities (LPAs) should consider the likely performance of LDDs on mitigating climate change and in adapting to the impacts of likely changes to the climate. This should be a key part of the Sustainability Appraisal (SA), which should be used to identify and evaluate possible tensions or inconsistencies between current or likely future, baseline conditions.
PPS3: Housing (2006)
Planning Policy Statement 3: Housing (PPS3) underpins the delivery of the Government's strategic housing policy objectives and the goal to ensure that everyone has the opportunity to live in a decent home, which they can afford, in a community where they want to live.
PPS12: Local Spatial Planning (2008)
Spatial planning plays a central role in the overall task of place shaping and in the delivery of land uses and associated activities. PPS12 sets out how policies should be prepared and what should be taken into account by LPAs in preparing LDDs.
Good Practice Guide on planning for Tourism (2006)
Highlights the key objectives which LPAs should take into account when planning for tourism in order to ensure that the characteristics, the trends and the needs within the tourism industry are considered in the development of plans and planning decisions.

Planning Policy Statement 25: Development and Flood Risk (2006)

Planning Policy Statement 25 (PPS25) sets out Government policy on development and flood risk. Its aims are to ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas of highest risk. Where new development is, exceptionally, necessary in such areas, policy aims to make it safe, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.

Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007)

Local authorities are important in tackling air quality issues. Local authorities will continue to periodically review and assess the current and likely future, air quality in their areas against the national air quality objectives.

Encroachment Policy for Tidal Rivers and Estuaries (2006)

Any proposed development close to tidal rivers and estuaries will require planning permission from the local authority and flood defence consent from the Environment Agency.

The London Plan (consolidated with alterations since 2004) (2008)

The London Plan integrates the physical and geographic dimensions of the Mayor's other strategies for the development of a framework for land use management and development in London. It also provides the London-wide context for all London boroughs when developing their local planning policies, which all boroughs DPDs must be in 'general conformity' with.

A selection of policies relevant to Kensington and Chelsea are:

POLICY 2A.7 AREAS FOR REGENERATION

North Kensington is identified as an area for regeneration.

POLICY 3A.2 BOROUGH HOUSING TARGETS

Kensington and Chelsea's expected targets for housing delivery are 3,500 new homes over a ten year period 2007/08 to 2016/17, with an annual monitoring target of 350 new homes.

POLICY 3D.4 DEVELOPMENT AND PROMOTION OF ARTS AND CULTURE

This policy aims to identify, protect and enhance Strategic Cultural Areas and their settings. The South Kensington museums complex is a Strategic Cultural Area.

POLICY 5F.1 THE STRATEGIC PRIORITIES FOR WEST LONDON

Some of the priorities are to promote London's world city role – Knightsbridge and South Kensington museums complex and an area for regeneration in parts of North Kensington.

The Mayor's Economic Development Strategy (2005)

This Strategy is produced on behalf of the Mayor of London by the London Development Agency (LDA) and it sets out the action plan for all those involved in London's economy and concerned with its success. The key aim is to develop London as an exemplary sustainable city with continued economic growth, social inclusivity and excellent environmental management; a good place to live, work, study and visit.

The London Rivers Action Plan (2009)

The London Rivers Action Plan (LRAP) details restoration opportunities and practical guidance to take forward London's river restoration strategies. The key aims of the LRAP are to: improve flood management using more natural processes; reduce the likely negative impacts of climate change; reconnect people to the natural environment through urban regeneration with better access for recreation and improved well-being; and to enhance habitats for wildlife.

Draft River Basin Management Plan (Thames River Basin District) (2009)

The Draft River Basin Management Plan (Thames Region) is prepared under the Water Framework Directive by the Environment Agency. The plan focuses on the protection, improvement and sustainable use of the water environment including surface freshwaters, groundwater, coastal waters and all estuarine waters. The plan also covers planning for future development including considering water quality, water resources, biodiversity and river restoration and surface water run-off.

Thames Estuary 2100 Plan (2009)

Thames Estuary 2100 (TE2100) plan looks at management of flood risk for London and the Thames Estuary in the short (25 years), medium (the following 40 years) and long term (to the end of the Century). In particular the plan considers how tidal flood risk is likely to change with climate change and with increases in population and development in the floodplain.

Air Quality Action Plan Consultation (2008)

The Royal Borough suffers from poor air quality caused mainly by two pollutants: NO₂ and PM10 from road vehicles and heating buildings. The Air Quality Action Plan consultation sets new targets and proposes actions to improve air quality in the Royal Borough in particular to these pollutants and to feed into the new action plan.

Local Implementation Plan (2007)

The Local Implementation Plan sets out the Council's proposals to implement the Mayor's Transport Strategy over the coming years across the Royal Borough.

Environment Strategy (2006)

Identifies the key priority areas for action in the Borough and where the most tangible difference can be made to achieving environmental sustainability. Also contains action plans and sets new targets.

Local Development Scheme (2008)

This is the programme for preparing the LDF over the next 3 years for the Borough. It proposes to fulfil four priorities for the LDF within specified time limits.

Community Strategy Update (2008)

The Community Strategy provides a future vision for the Borough's local community. This strategy is seeking to understand the local needs and opportunities and make plans for how these will be delivered aiming at improving the quality of life in the Royal Borough. The strategy is organised around eight themes dealing with aspects of life in the Royal Borough with a set of aims and objectives arranged around the themes.

Cabinet Business Plan 2009/10 to 2011/12: Proposals for Discussion (2009)

The Cabinet Business Plan sets out the Cabinet's policy priorities and budget proposals for the Council between the 2009/2010 and 2011/2012 financial years. The Cabinet Business Plan is updated annually.

Crime and Community Safety Plan 2008-2011 (2008)

This Crime and Community Safety Plan provides an account of the locally identified crime and anti-social behaviour priorities and details the goals and the measures/actions to tackle them in relation with the government's priorities and identifies partnerships for achieving these goals. The six local priority areas identified for action are: acquisitive crime, violence, street crime, the misuse of drug and alcohol and anti-social behaviour.

The Local Biodiversity Action Plan 2007-2011 (2007)

Protecting and enhancing locally important species and habitats and contribute to ecological sustainability and quality of life in Kensington and Chelsea. Habitat action plans are targeted and designed to benefit a wide range of plant and animal species. Since green space is limited in the Borough, there is both a need and opportunity to consider biodiversity in less obvious sites.

Ten Year Parks Strategy 2006/2015 (2006)

There is limited amount of open space in the Borough. This Strategy aims at protecting and bringing the Royal Borough's existing parks up to a consistently excellent standard due to the significant constraint of increasing open space. The Strategy proposes to improve the quality of existing parks by improving the management of parks, providing a wider range of facilities and enhancing the experience of all legitimate park users.

Play Strategy 2006/2009 (2006)

The Play Strategy highlights the importance of play in children's development. The aims are to maximise the use of parks and open spaces, as well as, other play opportunities, provide good quality and safe play opportunities and ensure accessibility for all children in the Borough.

Draft Strategic Flood Risk Assessment (2008)

The Draft Final SFRA for Kensington, Chelsea, Hammersmith and Fulham contains recommendations for how flood risk should be managed and reduced within the Borough. The SFRA focuses on existing site allocations within the Borough but also sets out the procedure to be followed when assessing sites for future development to assist with spatial planning.

For RBKC, Flood Zone 1 exists in the majority of the Borough, including all the area north and some of the area to the south of the Kings Road is Flood Zone 1. Flood Zone 1 equates to a flood event with less than a 0.1% chance of occurring each year (1 in 1000 year event).

The extent of Flood Zone 2 within the Borough is mostly the same as Flood Zone 3 with a few areas where it extends a little further, areas like the Westfield Park, Chelsea Manor Street and Christchurch Street. Flood Zone 2 equates to a flood event which has a between a 0.1% and 0.5% chance of each year (between a 1 in 1000 and 1 in 200 year event).

The extent of Flood Zone 3 covers a small portion of the Borough. Flood Zone 3 mainly consists of the areas adjacent to the Cheyne Walk and the Chelsea Embankment with wider extents around The Royal Hospital and Gardens, Ashburnham Road, Cremorne Road, Chelsea Manor Street and Christchurch Street. Flood Zone 3 equates to a flood event with a greater than a 0.5% chance of occurring each year (1 in 200 year event).

There are effectively no areas of functional floodplain within the Borough, however the tidal foreshore exposed each tide should be protected as this plays an important role in the functioning of the Tidal Thames.

Draft Strategic Housing Market Assessment (2009)

There is estimated to be an annual need for 3,663 affordable units in Kensington and Chelsea. In terms of the type of affordable accommodation required, further analysis suggests that 14% could be intermediate (if priced at the 'usefully affordable point') and the remaining 86% social rented. Almost three-quarters of the intermediate requirement is for intermediate-rented housing. Households in need in the North and North West of the Borough house price areas are least likely to be able to afford an intermediate housing solution.

An analysis of net need for affordable housing by bedroom size suggests that more than 40% of the net need is for studio or one bedroom accommodation, almost a third for two bedroom accommodation and almost 30% for three and four bedroom accommodation. The need relative to supply is greatest for larger (three and four bedroom) accommodation.

Employment Land Study (2007)

The analysis of the local economy in the Study identified many positive features, but three apparent deficiencies in RBKC:

- There is a concentration of socio-economic disadvantage in the North Kensington wards.
- Jobs located in Kensington and Chelsea on average are relatively low-paid; it seems that high-skilled, high-earning residents typically commute to work out of the Borough, largely to office jobs, while low skilled workers commute into the Borough, largely to jobs in consumer services such as retail and catering.
- While the Borough has a positive labour market balance – it provides more jobs than it has working residents - this balance has probably been deteriorating, due to the resident population growing faster than workplace employment.

The current UDP addresses the first deficiency.

In the new LDF, the Council may choose to correct the second deficiency, by encouraging higher-paid, higher-skilled jobs also to locate and remain in the Borough. With regard to labour market balance, the Council's scope for action is limited.

Kensington and Chelsea is home to specialist clusters in publishing and media and creative industries. The Council might consider an objective of supporting and encouraging these clusters through its planning policies.

The Employment Land Study has estimated a minimum requirement of 114,000 sq m of office/B1 space between 2001-21 and a maximum loss of 73,000 sq m of industrial/warehousing space over the same period.

Since there is no new development land in Kensington and Chelsea, and little or no land is likely to be transferred to employment land for other uses, the management of the existing stock is the main issue for the LDF.

All employment development in the Borough is likely to be redevelopment, mostly of existing employment sites. Much of this development is likely to be in mixed-use schemes.

The Study also suggests an approach to monitor and review employment land policies.

2.3 A2 – The sustainability baseline

- 2.3.1 The second element of collating evidence involves a review of the sustainability *baseline*. The distinction between what is 'context' and what is 'baseline' is in some instances blurry, although the baseline review is distinguished by a focus on collecting relevant quantitative information where possible. Again, the aim of the baseline review is to help identify sustainability issues in the RBKC (see SA Task A3 below), and it can also suggest indicators and thresholds that can aid the quantitative assessment of effects (where this is possible). The baseline review is also important in terms of suggesting appropriate monitoring indicators.

2.3.2 The SEA Directive's requirements in relation to baseline information are:

The 'Environmental Report' required under the SEA Directive should include:

"the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme"

"the environmental characteristics of areas likely to be significantly affected"

(Annex 1(b) and (c))

2.3.3 Set out in **Table 4** is a brief review of the sustainability baseline in the RBKC. This section provides an introduction to the Borough's environment, economy and community; as well as a brief analysis of how the Borough might look in the absence of the Core Strategy with a focus on North Kensington (the likely future baseline under a business as usual scenario).

Table 4: Summary of key baseline information and trends

Objective	Key information / trends
Biodiversity	<p>There is a significant biodiversity resource in Kensington and Chelsea. There are 27 Sites of Nature Conservation Importance (SINCs) that have been designated. There were significant losses in the period 1993 – 2002 and despite effort to create habitat as compensation, the issue of the difficulty of creating like for like habitats, and the neglect of other sites leads the report² to site the situation as "worrying".</p> <p>Two strategically important waterways provide boundaries to the Borough. In the north the Grand Union Canal (Paddington Arm) supports a variety of bank-side wildlife and aquatic species. Adjacent to the Canal is Kensal Green Cemetery, the largest area of continuous green-space in the Borough and has some of the most flower rich unimproved grasslands in London. In the south, the River Thames, which includes Chelsea Creek, provides an intertidal habitat and a valuable fish breeding ground, which in turn attracts many birds to the area. Additionally, Holland Park contains extensive areas of mature woodland, grassland and water habitats with wide diversity of species.</p> <p>There are many smaller sites within the Borough that play a valuable role in the biodiversity resource. Sites such as the Chelsea Physic Garden, Brompton Cemetery, Kensington Gardens, private gardens such as Ranelagh Gardens and the Ladbroke Grove Garden Complex and school wildlife gardens all provide a place for both native and ornamental species. In addition, the more strategic sites such as the River Thames, Grand Union Canal, and the railway lines that dissect the Borough create wildlife corridors.</p>
Crime	<p>In the period 2006/7 - 2007/8, there were notable decreases in domestic burglary offences (by 21.6%), common assaults (by 23.1%), and personal robbery offences (by 17.9%). Vehicle crimes decreased 7.2% and have shown significant reductions over the four previous years.</p> <p>Sexual offences between 2000/01 – 2007/08 have shown an overall increase of 9.7% and an average annual change of 1.2%. The same period showed an overall decrease in burglary (-43%), burglary from dwelling (-135%), theft of a motor vehicle (-161%) and theft from a motor vehicle (-22%).</p>

² RBKC (2004) *Local Biodiversity Action Plan 2004-2006*. RBKC

Objective	Key information / trends
	<p>The total notifiable offences in the Royal Borough of Kensington and Chelsea have decreased from the period 2001 – 2004. There have been greater areas of reduction in certain crime demographics, namely burglaries and violent crime which have decreased at a rate higher than the target of 15% reduction. This compares favourably with London crime reduction rates of 1.5%.</p> <p>The indices of Deprivation Domain for Crime, highlights Super Output Areas (SOA) that lie within ward boundaries that are within the 20% most deprived in England. These statistics have improved between 2004 and 2007: the number of SOAs within 20% most deprived in England decreased from 26 to 15. The wards with the most crime are concentrated in the north of the Borough, in the wards of Golborne, Colville, Notting Barns and Pembridge.</p>
Economy	<p>There has been a growth in the number of people of working age in the Royal Borough of Kensington and Chelsea from 114,710 in 2001 to 123,700 in 2007. This is a higher percentage of the population (69.3%) than for London (66.9%) and the UK (62.2%).</p> <p>A 38.5% increase in employment occurred between 1999/2000 and 2007/2008. The proportion of people of working age in employment in January-December 2007 and July 2007-June 2008 increased from 67.1% to 67.9%. This is lower than for London (69.8% and 70.6%) and for the England (74.4% Jan-Dec 2007) and the UK (74.5% July 2007 – June 2008). This figure has varied in the Borough over the last 10 years, from a high of 68.7% in March 2000-February 2001, to a low of 61.5% in April 2006-March 2007.</p> <p>The unemployment rate, as measured by claimants of job seekers allowance, compares well with London, being below the average, and claimants experienced a downward trend between 2000 and 2005 experiencing a 34% drop. Claimant count with rates dropped significantly between 2006 and 2008 to increase again in the end of 2008. Number of claimants remains lower than for London and the UK (respectively, May 2008: 1.7%, 2.5%, 2.1%, and December 2008: 2.0%, 3.2%, 3.0%).</p> <p>In 2007, average gross weekly earnings for the Borough (£862.4) were higher than for London (£580.8) and the UK (£479.3), and increased by £76 between 2007-08. Percentage of low pay for the Borough (8.2%) is lower than for London (12.8%) and the UK (13.1%) – although this figure has decreased since the 1990s, it has increased in most recent years.</p> <p>Levels of GVA per capita increased between 1995 and 2004 by 55.6% in RBKC to £88,563, and remain at a significantly higher level than in London and the UK. Although job density has decreased in RBKC from 1.34 in 2001 to 1.23 in 2003, it remains higher than for London (1.02) and the UK (0.88).</p> <p>The indices of Deprivation Domain for Income and Employment highlight Super Output Areas (SOA) that lie within ward boundaries that are within the 20% most deprived in England. These statistics have improved between 2004 and 2007: the number of SOAs within 20% most deprived in England decreased from 26 and 23 to 19 respectively. The wards with the most income deprivation are concentrated in the wards of St Charles, Golborne, Notting Barns, Colville, and Cremorne. The wards with the most employment deprivation are concentrated in the wards of Golborne, Notting Barns, Norland, and Redcliffe.</p>

Objective	Key information / trends
	<p>The recent Employment Land Study in the analysis of the local economy in the Study identified many positive features, but three apparent deficiencies in RBKC:</p> <ul style="list-style-type: none"> • There is a concentration of socio-economic disadvantage in the North Kensington wards. • Jobs located in Kensington and Chelsea on average are relatively low-paid; it seems that high-skilled, high-earning residents typically commute to work out of the Borough, while low skilled workers commute into the Borough. • While the Borough has a positive labour market balance – it provides more jobs than it has working residents. <p>The Employment Land Study has estimated a minimum requirement of 114,000 sq m of office/B1 space between 2001-21 and a maximum loss of 73,000 sq m of industrial/warehousing space over the same period.</p>
Equality	<p>Despite perceptions to the contrary, the entire Borough is not affluent. Of local authorities in England, the Borough has moved down the IMD rankings since 2004 by 15 places from 116/354 to 101/354 (1 is most deprived and 354 least deprived).</p> <p>Within the Royal Borough of Kensington and Chelsea, there is a clear north south delineation in regard to equity and social inclusion. Indices of Multiple Deprivation, clearly shows that the northern areas of the Borough are relatively more deprived than those in the south. Indeed, four wards (Golborne, St Charles, Notting Barns, Norland) in the north are in the 0-10% most deprived nationally, whereas the ward of Royal Hospital in the south includes an area are of the 81-100% least deprived, showing the Royal Borough to be an area of extremes.</p> <p>The distribution of indices for Education, Skills and Training, Health Deprivation and Disability, Income and Average Income, also mirror this pattern.</p> <p>Indices also vary for different criteria. For example, for education, skills and training deprivation (2007) 0 SOA's are within the 20% most deprived and 44 are within the 20% least deprived nationally – improving from 34 in 20% least deprived (2004). Whereas for barriers to housing and services (2007), 103 SOAs are within the 20% most deprived and 0 are within the 20% least deprived nationally – worsening from 23 in 20% most deprived (2004).</p> <p>The percentage of pupils achieving 5 or more GCSEs A* - C increased by 5.6% between 2005 and 2008 to 58.1% - higher than the England average of 47.3%. The percentage of pupils achieving Level 4 or above in Key Stage 2 Maths increased by 17% between 1997 and 2006/07 and for English by 20%. Achievement in maths and English are higher for RBKC in 2007 than for London and the UK.</p>
Climate change	<p>Of the data available, RBKC is currently performing well in regard to council owned buildings SAP scores, and has been rising and achieving in accordance with specified targets. The average energy efficiency of housing stock continues to improve.</p> <p>Although data is limited, it is available for 2005 and 2006.</p> <p>Gas consumption increased by 3.2% and electricity use decreased by 0.81% between 2005 and 2007 in RBKC. Overall, energy use per</p>

Objective	Key information / trends
	<p>household decreased (5.7% gas consumption decrease and 1.9% electricity consumption decrease) between 2005 and 2007. However, CO₂ emissions increased by 3.1% between 2005 and 2006. There was no change in renewable energy consumption between 2005 and 2006.</p> <p>Total vehicle kilometres steadily decreased between 2002 (590 million) and 2005 (580 million). Between 2005 and 2006, RBKC saw a slight increase in CO₂ emissions by end user from industry and commercial and domestic sources, but a slight decrease from transport.</p>
Flooding	<p>The Royal Borough of Kensington and Chelsea lies to the north of the river Thames. The Thames barrier offers defence against flooding for all London boroughs with borders to the Thames.</p> <p>The south of the Borough is at risk from flooding by the Thames, with the wards of Cremorne and Royal Hospital containing areas of Flood Zone 2 and Flood Zone 3. The wards of Redcliffe, Earls Court and Stanley to the south west of the Borough also fall within this area of Flood Zone 2. The ward of Holland, in the west of the Borough, contains an area of Flood Zone 2.</p> <p>92% of the Royal Borough has less than 0.1% probability of flooding in any year, 2% of the Borough has 0.1%-0.5% probability of flooding and only 6% has high probability of flooding-mainly areas adjacent to the Thames river. There are 4,823 properties (6% of all properties) at risk of tidal flooding. Approximately 92% of the properties at risk of flooding are residential.</p> <p>The main risk of flooding that the Borough faces is flooding from sewer and surface water. The modelling work undertaken as part of the Borough's Strategic Flood Risk Assessment (SFRA), shows that risk of surface water flooding is widespread at locations throughout the Borough. 373 properties flooded as a result of heavy rainfall causing surface water flooding on 20th July 2007.³</p>
Air quality	<p>All of the Royal Borough of Kensington and Chelsea has been declared as an Air Quality Management Area (AQMA) for predicted exceedance of the objective values for PM₁₀ (Particulate Matter < 10 micrometres) and the annual mean NO₂ (Nitrogen Dioxide).</p> <p>There has been a steady decrease in annual background PM₁₀ concentrations between 2003 and 2007 (28 to 25) and roadside between 2001 and 2007 (from 45 to 35) to within the objective target of 10-40µg/m².</p> <p>Days when concentrations of PM₁₀ exceed 50 µg/m³ between 2005-2007 for the following wards: Earl's Court ~80, ~70, ~70; Cromwell Rd: ~40, ~60, ~35; North Kensington: ~50, <20, 19. Although overall there has been improvement between 2005 and 2007, the improvement is less clear between 2006 and 2007 and a high concentration was recorded for Crowell Road ward in 2006 making the overall trend unclear. The objective value for 2004 was 35 exceedances and, of these three wards, North Kensington was the only ward to clearly meet this target in 2007 (and 2006).</p> <p>All sites have been above the annual mean NO₂ concentrations for all years apart from North Kensington which fell below the objective level for the first time in 2006 and has remained just below in 2007. Also, for the</p>

³ RBKC (2008) Strategic Flood Risk Assessment [online] available at: http://www.rbkc.gov.uk/planning/localdevelopmentframework/ldf_strategic_flood_assess_map.pdf (accessed 03/09)

Objective	Key information / trends
	<p>first time in five years there has been an overall decline in annual mean levels at roadside locations.</p> <p>The objective for number of times in one hour the concentration of NO₂ exceed 200 µg/m³ is 18, and this is reached by North Kensington and Cromwell Road, although it should be noted that North Kensington's average was higher for 2007 than 2006. Between 2005 and 2007, Knightsbridge peaked at 449 in 2007 and Chelsea Town Hall at 136 in 2006, showing an unclear trend for Chelsea Town Hall but an increasing and worsening trend for Knightsbridge.</p> <p>The introduction of stricter objectives for 2010 may mean that there will potentially be larger areas exceeding the objectives.</p>
Parks and open spaces	<p>RBKC has the second lowest proportion of open space to total land areas in London (2.8%) and the lowest proportion of open space per 1,000 population in London (0.26ha). There are areas within the Borough where there is open space deprivation. To the south, the wards of Courtfield, Brompton, Redcliffe, Hans Town, Stanley, Royal Hospital and Cremorne are affected; the north west, Golbourne, St Charles, Colville, Notting Barns and Norland wards are affected by open space deprivation.</p> <p>There are 188 hectares of open space in the Borough; 51 hectares of public open space, 47 hectares of public open space with limited access and 90 hectares of private open space. In total this provides 2.8 square metres of public open space per resident. However, the Borough has limited amounts of public and private open space. According to the Park Strategy, the aim of the Council is to improve the quality of existing space rather than increase the amount of open space.</p>
Pollution	<p>Noise complaints are rising with 6, 751 (2004/05), 9,504 (2005/06) and 9,706 (2006/07). Noise complaints were particularly elevated in 2000/01, 7,142. Complaints about other nuisance are reducing.</p> <p>In 2005, water quality in this area of the Thames had been increasing for a period of eight years. There is a data gap for more recent information on river quality in this area of the Thames.</p> <p>All land incidents recorded in Kensington and Chelsea have had no environmental impact (category 4) over the last five years, with the exception of two with minor environmental impact (category 3). There has been an improvement in the number of land pollution incidents, although there was an increase in 2007.</p>
Previously developed land	<p>RBKC performs particularly well in regard to this objective, having 100% of development on previously developed land for the last four years, exceeding London (98%), the UK (70%) and the National Headline Target of 60%. This trend looks likely to continue. In 2005 land use in the Borough comprised:</p> <ul style="list-style-type: none"> • Domestic buildings 19.2% • Non domestic buildings 11.2% • Road 23.4% • Domestic gardens 17.5% • Green space 15.1%

Objective	Key information / trends
	<ul style="list-style-type: none"> Water 2.5%
Transport	<p>The baseline information for air pollution indicates that road vehicles are a significant source of the air pollution within the Borough. The air quality modelling figures reinforce this message with areas of higher pollutant concentrations being the major road transport routes.</p> <p>Accessibility to public transport in the Borough is variable. Access rated very poor or worse is mainly located at the extremities of the ward; in the north west of the Borough (Golborne and St Charles wards) and the centre of the Borough (Holland), and to a lesser degree in the south (Redcliffe, Cremorne and Royal Hospital). Very good access runs through much of the centre of the Borough (with the exception of Holland ward).</p>
Waste	<p>Overall the Borough has made good progress in its waste indicators. Between 2006/07 and 2007/08 household waste recycled increased by 3.45%. Percentage composted improved in this time period from 0.69% to 0.90%. The figure for 2006/07 is better in the Borough (26.58% recycled and 0.69%) compared to London (23% recycled or composted). In 2006 to 2007 the Council began to distribute free orange recycling sacks to all residents in a doorstep collection service which mean that the Council is just 2.7% behind the London wide target, which has increased to 27%. The Borough is also very densely populated with a very small number of private gardens that produce compostable waste. 1% target is the maximum attainable, unless the Council moves into the exceptionally difficult area of kitchen waste composting.</p> <p>The Borough has made progress in achieving over 8% year on year reduction on percentage of household waste land filled. There has been an increase in the number of mini recycling centres from 24 to 26 in 2007/08.</p> <p>Levels of household waste collected per head were lower in the Borough (349.3kg) than for London (428.7kg) and England (441.3kg) in 2007/08. However, this figure is still quite high with an increase in 2007/08 that is probably largely due to population estimate changes.</p> <p>The cost of waste collection dropped between 2006/07 and 2007/08 from £62.26 to £59.23 and targets were met. The target of 100% population served by kerbside collection or within 1km of recycling centre has been consistently reached in consecutive years because the collection of household green waste for composting counts as a recyclable collection for the purpose of this indicator.</p>
Community facilities	<p>The information available indicates that accessibility in the Borough is on the increase, with 17.2% of local authority buildings suitable for and accessible by the disabled increasing to 28% in 2006/7. There is insufficient data to identify local trend in terms of access to services and facilities against London and national indicators.</p> <p>Three main public leisure centres serve the Borough and each of the main parks has a range of sports facilities on offer. There is no change in the number of public leisure centres and sport facilities.</p> <p>In terms of health, deprivation and disability; the wards in the north of the Borough (St Charles, Holborne, Notting Barns, much of Colville and Norland), rank 40% most deprived or worse. However, much of the other wards include areas of 81-100% least deprived, particularly Pembridge,</p>

Objective	Key information / trends
	<p>Campden, Queen's Gate and Royal Hospital. Wards along the west boundary of the Borough are of mixed deprivation levels. For Education, Skills and Training, most of the Borough ranks reasonably well, but, again, with clearer levels of deprivation to the north. Norland, St Charles and Golborne in the north, and Cremorne in the south west, contain areas that are 21-40% most deprived.</p>
Housing	<p>The Royal Borough has the highest property prices in the country. In 2008, the average residential property price in the Borough (£869,808) for exceeded the London (£345,911) and national average (£179,455). The average house price rose by almost £150,000 between April 2006 (£602,662) and April 2007 (765,926). This is a three times the amount of the previous year's increase of approximately £50,000 over the year. House price to income ratio is also higher and a significant increase occurred between 2003 and 2005 in the house price to income ratio.</p> <p>In the UK in 2007 a little under 35% of the housing stock comprised unfit dwellings. In the Borough, just 4.1% of dwellings were unfit. However, in 2006 6.1% of private sector housing was unfit compared to 4.3% in the same study in 2000. The Borough has predicted is forecast to exceed its target by the end of 2016 to 2017, by achieving over 7000 net units.</p> <p>Homelessness increased in the Borough from 1,146 in 2007/08 compared to 629 in 2003/04</p> <p>The number of decent homes has gone down and non-decent local authority dwellings changed by 19.5% (2006/07-2007/08).</p> <p>Dwelling density and numbers of derelict buildings are a likely data gap.</p> <p>The Royal Borough of Kensington and Chelsea is the most densely populated area in the country. Additionally, there are 103 Super Output Areas (SOAs) are ranked in the most deprived 20% of authorities in England in relation to the indices of deprivation for barriers to housing and services housing. This has increased from 23 SOAs ranked in the most deprived 20% in 2004.</p>
Energy efficiency	<p>In 2001 it was estimated that 31% of households in the Council's stock, and 13% of private sector households were fuel poor. There has been as significant decrease in fuel poor households in the Royal Borough.</p> <p>Energy efficiency improvements have been carried in Council owned buildings. In 2002 HRA was reported that 90% of the Council stock had full or partial central heating.</p> <p>Number of Decent Homes has gone down with a net reduction of over 200 properties. In regard to energy efficiency, there is a lack of data on any BREEAM or Ecohomes or equivalent assessments in the Borough, although the Council does perform well in regard to SAP ratings for Council owned buildings.</p>
Health	<p>The Royal Borough of Kensington and Chelsea generally performs well in regard to health. However, in considering the distribution of equality of health care it is interesting to note that in 2007 the northern area of the Borough has 3 SOAs ranked as the worst 20% performing SOAs in the England. The worst performing SOAs are found in St Charles, Golborne, and Notting Barns wards. This has improved from 2004 where there were 7 SOAs ranked as the worst performing 20%.</p> <p>The Royal Borough has higher life expectancies that the London and England and Wales averages.</p>

Objective	Key information / trends
Local distinctiveness	<p>A large part of the Borough derives its character and townscape from its heritage of eighteenth, nineteenth and early twentieth century buildings. The Council has designated 36 Conservation Areas, encompassing about 72% of the Borough. The Borough also contains over 4,000 buildings which are listed at Grade II or above for their special architectural or historic interest.</p> <p>There are further areas of architectural character and historic interest including strategically important views, for example that of St. Paul's Cathedral. The strategic importance of the Thames and the functions it serves in addition to its importance for archaeology are also recognised. The Borough's scheduled monuments, registered parks and gardens and archaeological priority areas are also important to local distinctiveness.</p>

2.3.4 **Table 5** aims to summarise key indicator trends from the recent baseline update in the SA Update Report.

Table 5: Key indicator trends from the 2009 baseline update

Indicator	Improved (+) or worsened (-)	Summary of key trends
Objective 1: Biodiversity		
Bird Populations	-	Dunnock-marked decrease, Song Thrush decrease, House Sparrow locally extinct, Starling decrease [2006]
Objective 2: Crime		
Crime survey and recorded crime	+	23,485 notifiable offences in 2007/08 compared to 30,714 in 2000/01
Violence against the person	+	Decrease in numbers of registered cases. 3,168 cases in 2007/08 compared to 3,378 cases in 2003/04
Burglary from Dwelling	+	1,086 cases in 2007/08 compared to 2,558 cases in 2000/01
Burglary (not from dwelling)	+	697 cases in 2007/08 compared to 991 cases in 2000/01
Sexual offences	+	154 cases in 2007/08 compared to 265 cases in 2003/04
Theft of a motor vehicle	+	566 cases in 2007/08 compared to 1,481 in 2000/01
Crime and disorder (calls to police regarding anti social behaviour)	+	8,251 cases in 2007/08 compared to 11,844 in 2000
Drug offences	-	2,721 cases in 2007/08 compared to 1,019 cases in 2003/04

Indicator	Improved (+) or worsened (-)	Summary of key trends
Objective 4: Equalities		
Percentage of pupils achieving Level 4 or above in Key Stage 2 English	+	87.2% in 2007/08 compared to 84% in 2003/04
Percentage of pupils achieving 5 or more GCSEs at Grades A*-C or equivalent	+	58.1% in 2008 compared to 56% in 2003/04
Percentage of pupils achieving Level 4 or above in Key Stage 2 Maths	+	83.4% in 2007/08 compared to 79% in 2003/04
Objective 7: Air quality		
Days when air pollution is Moderate or Higher (PM10)	+	In North Kensington, 19 days in 2007 compared to 59 days in 2003
Objective 11: Waste		
BV82a Household waste – percentage recycled	+	27.03% in 2007/08 compared to 16.13% in 2003/04
BV82a Household waste – percentage composted	+	0.9% in 2007/08 compared to 0.34% identified in the 2005 baseline
Objective 12: Community facilities		
Percentage of local authority buildings suitable for and accessible by disabled people	+	28% in 2006/07 compared to 14% in 2002/03
Objective 13: Housing		
Average house prices	-	The average house price rose by almost £150,000 between April 2006 (£602,662) and April 2007 (765,926). This is a three times the amount of the previous year's increase of approximately £50,000 over the year.
House price to income ratio	-	7.72 in 2005 compared to 4.47 in 2003
Housing conditions	+	Non-decent local authority dwellings was 24% in 2007/08 compared to 57% in 2003/04
Homelessness – households in temporary accommodation	-	1,146 in 2007/08 compared to 629 in 2003/04
Objective 14: Energy efficiency		
SAP ratings of council's housing stock	+	71 in 2007/08 compared to 61 in 2002/03

Indicator	Improved (+) or worsened (-)	Summary of key trends
Objective 15: Health		
Health inequality	+	Male and female life expectancy at birth was 83.7 and 87.8 respectively in 2005/07 compared to 79 and 81.4 in 2000/02

The ‘future baseline’ *without* the plan - the ‘business-as-usual’ scenario

- 2.3.5 In Kensington and Chelsea, there are likely to be increasing pressures on the environment. Pressures will increase for biodiversity and scarcity of open spaces due to lack of land for development and creation of open space; adaptability of existing buildings to climate change and further surface and sewer flood risk and air pollution from sources outside the Borough is also likely to impact.
- 2.3.6 In terms of the socio-economic conditions in Kensington and Chelsea; the area is likely to continue to see the highest house prices in the Country and contain high income earners who will commute to higher paid jobs outside of the Borough. However, the deprivation that exists in areas in the north and south west of the Borough could get worse with additional strain on the supply of housing and community infrastructure in the future. In terms of transport, accessibility to public transport could increase in the Borough with a proposed crossrail station at Kensal and additional London Underground / Overground stations in Kings Road and Lots Road/Worlds End.

2.4 A3 – Sustainability Issues

- 2.4.1 Task A3 involves drawing on the evidence gathered in Tasks A1 and A2 to identify those sustainability issues that are most pressing. The sustainability issues identified then form the basis for developing a robust SA framework (Task A4). Furthermore, the sustainability issues are a useful source of evidence to draw upon at the assessment stage.
- 2.4.2 The requirement to identify sustainability issues arises from the SEA Directive:

The ‘Environmental Report’ required under the SEA Directive should include:

“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’]”

(Annex 1(d))

- 2.4.3 **Table 6** lists the economic, social and environmental problems facing the Royal Borough of Kensington and Chelsea, as set out in the Scoping Report and SA Update Report.

Table 6: Sustainability issues facing RBKC

Sustainability problem	Supporting evidence
Environment	
Air quality – the whole Borough is a declared AQMA for both PM ₁₀ and NO ₂	RBKC Inception Meeting (10/02/05) Days when concentrations of PM ₁₀ exceed 50 µg/m ³ Annual mean NO ₂ concentrations No of times 1-hour concentration of NO ₂ exceed 200 µg/m ³
Open Space – there is a shortage of open space in the Borough, and a shortage of areas in which to create additional open space.	RBKC Inception Meeting (10/02/05) Open space per resident ha / resident – Second lowest proportion of open space to total land areas and lowest per population in London and the UK.
Noise and Vibration – complaints have been rising since 2004	RBKC Inception Meeting (10/02/05) Public concern over noise
Traffic – two thirds more parking permits issued than parking spaces	RBKC Inception Meeting (10/02/05)
Waste – RBKC not meeting recycling targets	RBKC Inception Meeting (10/02/05) Household waste - percentage recycled, Household waste - percentage composted, just below London averages Adequate waste and recycling storage in new builds / housing conversions / office space (also to include community composting)
Area of sites of nature conservation value	Bird Populations in decline Loss of sites of conservation value.
Social	
Housing – the availability of low cost, affordable housing	RBKC Inception Meeting (10/02/05) Average house prices – highest in the UK at over £850,000 in 2008. Homelessness – upward trend in the numbers of homeless since 2000/2001
Health - Shortage of Doctors Surgeries and GPs	RBKC Inception Meeting (10/02/05)
Education – Monitoring of education performance in the Borough proposed. Need for secondary school in the SW of the Borough.	RBKC Inception Meeting (10/02/05) No. of pupils per 1,000 permanently excluded from primary schools – increased by nearly 200% from 2001/2002 levels in 2003/2004.
Community Facilities – lack of elderly person homes (Care Homes).	RBKC Inception Meeting (10/02/05)
Crime	RBKC Inception Meeting (10/02/05) Total notifiable offences are declining; however, there have been increases in drug offences.

Sustainability problem	Supporting evidence
Economic	
Deprivation – some wards amongst the most economically deprived in the country in particular, North Kensington (north of the Westway) and SW Chelsea.	RBKC Inception Meeting (10/02/05) Income and Employment indices of deprivation - Clear inequalities between the North and the South of the Borough with many SOA's being in the bottom 20% of those in the England. Index of multiple deprivation shows a clear delineation between north and south.
Shortage of small office units, <300m ² and particularly <100m ² .	RBKC Inception Meeting (10/02/05) The Employment Land Study has estimated a minimum requirement of 114,000 sq m of office/B1 space between 2001-21 and a maximum loss of 73,000 sq m of industrial/warehousing space over the same period.
Average house prices	Average house prices the highest in the UK at over £850,000 in 2008, creating a barrier to entry for low and medium level earners.

2.5 A4 – Developing the SA Framework

- 2.5.1 SA is fundamentally based on an objectives-led approach whereby the potential impacts of a plan are gauged in relation to a series of aspirational objectives for sustainable development. In other words, the objectives provide a methodological yardstick against which to assess the effects of the plan.
- 2.5.2 The SA objectives were developed primarily by drawing on the sustainability issues identified at Task A3, but also taking account of other evidence gathered at Tasks A1 and A2. **Table 7** sets out the SA Objectives identified for the Royal Borough of Kensington and Chelsea. This table includes changes made to the SA Framework from the SA Update Report as shown in *italics*.

Table 7: The RBKC LDF SA Objectives

1. To conserve and enhance the natural environment and biodiversity
2. 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. Encourage social inclusion (<i>including access</i>), equity, the promotion of equality and a respect for diversity
5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables <i>and adopt measures to adapt to climate change</i>
6. Reduce the risk of flooding to current and future residents
7. Improve air quality in the Royal Borough
8. Protect and enhance the Royal Borough's parks and open spaces
9. Reduce pollution of air, water and land
9a. 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. Reduce the amount of waste produced and maximise the amount of waste that is recycled
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
13. To aim that the housing needs of the Royal Borough's residents are met
14. Encourage energy efficiency through building design; maximise the re-use of building's and the recycling of building materials
15. 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

3 The Core Strategy

3.1.1 The statutory spatial development plan for the Royal Borough of Kensington and Chelsea is called the Local Development Framework (LDF) and is made up of a portfolio of documents, including the Core Strategy with a focus on North Kensington Plan Development Plan Document (DPD) ('the Core Strategy'). The Core Strategy is the principal document in the LDF and, once adopted, will set out the Borough's future development over the next 20 years. In particular, it will be used to identify and propose development of strategic importance to the Borough. Importantly, the other documents contained in the LDF must be in general conformity with the Core Strategy.

3.1.2 The Borough has reached the pre-submission stage in the development of the Core Strategy. The Core Strategy is based around three main components: the Spatial Strategy, the Delivery Strategy and supporting information:

- The **Spatial Strategy** is divided into two parts and sets out what the Borough wants to achieve:
 - **Strategic Objectives** – these inform the direction of the Core Strategy and outline how to achieve the Core Strategy's vision
 - **Places** – these key areas identified across the Borough which are seen to require particular focus, some of which are planned for considerable change
- The **Delivery Strategy** sets out how the Spatial Strategy is to be achieved and is divided into two main parts:
 - **Strategic Sites** – these are allocated areas within the Borough which are needed to deliver the Spatial Strategy
 - **Development Management Policies** – these add further depth to the delivery of the Strategic Objectives

3.1.3 The **Supporting information** contains the Housing Trajectory as well as other supporting information.

3.1.4 This Sustainability Appraisal has been undertaken on the four main elements of the Spatial Strategy and Delivery Strategy: Strategic Objectives, Places, Strategic Sites and Development Management Policies.

3.2 The Core Strategy Objectives

3.2.1 The Core Strategy identifies seven Strategic Objectives. The Strategic Objectives structure the plan and have been used to inform the whole direction of the plan. They set out how the 'Vision' of the Core Strategy will be delivered and hence can be considered as the 'Core Strategy'. The Strategic Objectives are included in **Table 8**.

Table 8: Core Strategy Strategic Objectives

Strategic Objective	Topics addressed by strategic objective
Keeping Life Local	Social and community uses, local shopping facilities, 'walkable neighbourhoods'
Fostering Vitality	Town centres, retail, arts and culture, business
Better Travel Choices	Public transport, walking and cycling, parking
An Engaging Public Realm	Sense of place, streets, parks and outdoor spaces
Renewing the Legacy	Design and conservation
A Diversity of Housing	Affordable and market housing, estate renewal
Respecting Environmental Limits	Climate change, waste, flooding, biodiversity, air quality and noise

3.3 Places

3.3.1 Fourteen places have been identified by the Borough for proposed development. They include areas proposed for regeneration, areas that experience particularly high numbers of visitors and retail destinations. These are included in **Table 9**.

Table 9: Core Strategy Strategic Objectives

Regeneration Areas	Areas with high visitor numbers
Kensal	Portobello/Notting Hill
Golborne/Trellick	Knightsbridge
Wornington Green	Exhibition Road
Latimer	Retail Destinations
Earl's Court	Kings Road
Lots Road/Worlds End	Kensington High Street
Westway	Brompton Cross
Notting Hill Gate	Fulham Road

3.4 Strategic Sites

3.4.1 The Strategic Sites set out the Borough is to achieve its spatial strategy, i.e. the ‘Strategic Objectives’ and ‘Places’. Seven Strategic Sites have been identified across the Borough in **Table 10**.

Table 10: Core Strategy Strategic Sites

Strategic Sites
Kensal Gasworks (sites north and south of the railway)
Wornington Green
Land adjacent to Trellick Tower
North Kensington Sports Centre
The former Commonwealth Institute
Warwick Road (5 sites including 100 West Cromwell Road)
Earl’s Court

Reasons for selecting the preferred strategic sites

3.4.2 Work on the Core Strategy began in 2004 and a formal Issues and Options stage was held in November 2005. Following this, a second stage of Interim Issues and Options for the Core Strategy took place in February – March 2008. The “Towards Preferred Options” document is the third stage in the preparation of the Core Strategy where a consultation opportunity was held between July and October 2008. The “Towards Preferred Options” was where the North Kensington Area Action Plan (NKAAP), which was a separate DPD, was incorporated into the Core Strategy. The DPD was then now referred to as the Core Strategy and North Kensington Plan. Prior to this inclusion, the NKAAP was subject to a formal Issues and Options stage in February 2008. In July 2009 the Council finalised the Core Strategy with a focus on North Kensington.

3.4.3 **Figure 3** illustrates the development of the Core Strategy.

Figure 3: History of the development of the Core Strategy with a focus on North Kensington



3.4.4 **Figure 4** illustrates when and where strategic site options were considered in the development of the plan.

Figure 4: Consideration of Core Strategy Strategic Sites

Kensal	Wornington Green	Trellick Tower	North Kensington Sports Centre	Commonwealth Institute	Warwick Road	Earl's Court
<p>North Kensington Area Action Plan February 2008</p> <p>Option 4: piecemeal development of just the Ballymore and Sainsbury's sites, (in effect the medium growth option of the NKAAP)</p> <p>Option 5: status quo – leaving as an employment zone and seeing what happens. (ie low growth option in NKAAP)</p>						
<p>Towards Preferred Options July 2008</p> <p>Option 1: A residential-dominant scheme with possibly up to 5184 dwellings and 20,000sqm of commercial floorspace (the maximum proposed with a Crossrail station);</p> <p>Option 2: Significant mixed use redevelopment with a Crossrail station</p> <p>Option 3: A single use "megastructure campus" (this would most likely be linked to health or education) scheme with 404 dwellings and 500,000sqm of commercial floorspace without Crossrail and 920 dwellings and 580,000sqm with a station.</p>			<p>Two options considered:</p> <ul style="list-style-type: none"> To rebuild the sports centre Move the sports centre to another location 			<p>Three options considered:</p> <ul style="list-style-type: none"> Office led mixed use development; Residential led mixed use development; and Development including a convention or exhibition centre <p>Development of the site includes a larger part of the site in Hammersmith & Fulham. RBKC will not develop the site alone.</p>
Other	<p>Site Owner researched options:</p> <p>Option 0: Decent Homes Standard</p> <p>Option 1: Full Refurbishment and Remodelling</p> <p>Option 2: Refurbishment, remodelling and focused redevelopment</p> <p>Option 3: Minimum refurbishment, with extensive redevelopment</p> <p>Option 4: Full Redevelopment.</p>	<p>Stock Options review:</p> <p>Option 1: to redevelop the full estate (except for Trellick tower) including some realignment of the road system to make for better connections and bus-services. Some 'sub-options' include the full reinstatement of the historic street pattern, others do not, but all involve the replacement of the existing housing estate.</p>	<p>Options considered following the Towards Preferred Options:</p> <p>Option 1: status quo</p> <p>Option 2: Incorporating it as part of a wider masterplan – i.e. using it as part of a decant strategy. This was implicit in the Towards Preferred options document where it was referenced as part of the wider masterplan for the area.</p> <p>Option 3: Discrete site</p>	<p>Options considered in draft SPD:</p> <p>3 options for use of the tent</p> <p>Option 1: exhibition use</p> <p>Option 2: assembly and leisure uses</p> <p>Option 3: theatre use</p> <p>4 options for use of the rest of the site</p> <p>Option 1: residential</p> <p>Option 2: offices</p> <p>Option 3: hotel</p> <p>Option 4: retail</p>	<p>Options for four sites considered in adopted SPD and guidelines to be issued for West Cromwell Road.</p> <p>Existing range of uses were allowed to change to residential and two planning permissions have been granted on this basis.</p>	

Royal Borough of Kensington and Chelsea

Sustainability Appraisal of the Core Strategy with a focus on North Kensington

...continued

Kensal	Wornington Green	Trellick Tower	North Kensington Sports Centre	Commonwealth Institute	Warwick Road	Earl's Court
		<p>Option 2: restricting redevelopment to the vacant site to the south west of Trellick Tower, and using this for housing purposes as part of the need to raise revenue to restore Trellick Tower. The new housing built may be used either for private sale, or to relocate residents in the tower, which would then, following refurbishment, be released for private sale.</p> <p>Option 3: as option 2, but developing housing that focuses on the needs of older people, reflecting the fact that the last use of the site was an old people's home.</p>	<p>redevelopment for a sports centre and some housing.</p> <p>Option 4: Discrete site redevelopment for a school, and possibly new sport centre and housing – this responds to the feedback from the consultations, and our overriding need to identify a school site. It doesn't jeopardise wider planning objectives (just removes a possible decant site).</p>			
<p>North Kensington Area Action Plan February 2008</p> <p>Preferred option: Option 2: Significant mixed use redevelopment with a Crossrail station</p>	<p>Preferred option: Option 4: Full redevelopment</p>	<p>Preferred option: Option 2: restricting redevelopment to the vacant site to the south west of Trellick Tower, and using this for housing purposes as part of the need to raise revenue to restore Trellick Tower. The new housing built may be used either for private sale, or to relocate residents in the tower, which would then, following refurbishment, be released for private sale. This option also includes restoration of the Grade II* listed Trellick Tower.</p>	<p>Preferred option: Option 4: site redevelopment for a school, and possibly new sport centre and housing – this responds to the feedback from the consultations and our overriding need to identify a school site. It doesn't jeopardise wider planning objectives (just removes a possible decant site)</p>	<p>Preferred option: Use of the tent - Option 1: Exhibition use Use of rest of the site – no preferred option: Option 1: residential Option 2: offices Option 3: hotel Option 4: retail</p>	<p>Preferred option: Residential led mixed use development</p>	<p>Preferred option: Mixed use with a Convention Centre or Exhibition use</p>

- 3.4.5 The information contained in the next section is taken from the Core Strategy with a focus on North Kensington document and background information on options development for the strategic sites prepared by the Council.

Kensal Gasworks (sites north and south of the railway)

- 3.4.6 Kensal represents a significant opportunity to act as a catalyst not only for the regeneration of the north of the Borough but for north/west-central London as a whole.
- 3.4.7 The positioning of a new Crossrail station, which will provide a high speed link to the West End, the City and Canary Wharf will dramatically enhance accessibility and create employment, homes and recreational opportunities. This would mean that a larger residential population with the necessary infrastructure could be supported.
- 3.4.8 According to the Council, the preferred option of development of a mixed use scheme is more likely to stimulate regeneration by integrating with the rest of North Kensington as it is likely to provide functions which are valued by those in the wider area. The provision of a Crossrail station will also mean that the station should be used to its full potential which means providing uses which would ensure that station is well used outside peak times. The residential development on these sites will also positively contribute to the Council's housing requirements.

Wornington Green

- 3.4.9 The current housing on the site fails to meet the Decent Homes Standards. Kensington Housing Trust, who own the site have expressed a strong preference to redevelop the estate, using receipts from private housing to fund the re-provision of the existing social rented housing. As Wornington Green Estate is predominantly social housing it is of strategic importance that any redevelopment of the estate delivers the strategic objective "Diversity of Housing" which is one of the seven strategic themes of the Core Strategy. Re-provision of the existing social housing but also providing for private market housing will create a greater diversity of housing and therefore is of strategic importance to the Borough.
- 3.4.10 According to the Council, the preferred option of a total redevelopment option would restore also the original streetscape back into the wider community, it would solve some of the crime and disorderly issues currently faced on the estate, it would provide a balanced and mixed tenure community and the wider community will benefit from a new better quality park and community facility.

Land adjacent to Trellick Tower

- 3.4.11 Trellick Tower is a Grade II* building and any development surrounding the building needs to be carefully managed to ensure that the historical character of the buildings setting is maintained. It is an important part of the Borough's heritage and is central to the 'Renewing the Legacy' strategic objective of the Core Strategy.
- 3.4.12 According to the Council, the preferred option of restricting redevelopment to the vacant site to the south west of Trellick Tower, and using this for housing purposes as part of the need to raise revenue to restore Trellick Tower. The new housing built may be used either for private sale, or to relocate residents in the tower, which would then, following refurbishment, be released for private sale. This option presents the ability to restore the Grade II* listed Trellick Tower.

North Kensington Sports Centre

- 3.4.13 It is a strategic site because it has been identified to accommodate the new secondary school required in the north of the Borough. The site is also currently an important sports and leisure facility in this part of the Borough. (see Keeping Life Local strategic objective).
- 3.4.14 According to the Council, the preferred option of discrete site redevelopment for a school, and possibly new sports centre and housing responds to the feedback from previous consultations and the Borough's overriding need to identify a school site.

The former Commonwealth Institute

- 3.4.15 This site has been allocated as strategic site despite its relatively small size given the potential that it has to ensure that the vision for the Kensington High Street place will be achieved. The re-use of the site as a major trip generating exhibition space could help anchor the western end of Kensington High Street and give it a new focus at a time where the centre is likely to be under considerable pressure from both the current market down turn and from the shopping centre at Westfield London. In addition, a use needs to be found to secure the long term future of this unique Grade II* listed building.
- 3.4.16 According to the Council, the preferable option for the use of the tent is as an exhibition centre as this is the use that the building was designed for, and as the draft SPD points out, "the best use for a listed building is that for which it was originally designed". However, assembly and leisure and theatre use may be appropriate.
- 3.4.17 In regard to the rest of the site, the Council suggests that suggests that residential, offices, hotel or retail uses may be appropriate as long as they will enable the protection of the integrity of the "tent". The Council does not therefore have a preferred option, although notes that a mixed use including aspects of all/some could be appropriate given the sites location immediately abutting the Kensington High Street Major Shopping Centre.

Warwick Road (5 sites including 100 West Cromwell Road)

- 3.4.18 The site will meet a significant proportion of the housing target in the Borough by creating a high quality residential environment with an opportunity for a coordinated sustainable development and related infrastructure including the provision of associated community facilities. The design of the development will incorporate high standard architecture and will consider community safety.
- 3.4.19 The existing range of different uses (offices, Territorial Army centre, etc) and existing office permission (unimplemented, 100 West Cromwell Road) were allowed to change to residential to meet the Borough's required housing need. Given that two planning permissions have been granted on the northern sites on this basis, it is not possible to return to this decision now. No other land use options were therefore considered.

Earl's Court

- 3.4.20 The site is of the strategic importance because of its size and its current pan-London function as an exhibition centre. The aim of this site is to provide a mixed use development which will include residential and employment uses. The wider Earl's Court site includes sites in the London Borough of Hammersmith and Fulham. A comprehensive scheme for the wider site could provide a strong mix of development, a vibrant new community, new housing, and the economies of scale needed to support and attract facilities such as a potential Convention Centre

and leisure or cultural uses. Further details will be specified in a forthcoming Area Action Plan prepared jointly with the London Borough of Hammersmith and Fulham. The area will be designated as an Opportunity area in the new London Plan.

3.4.21 The Council did not consider preparing plans for the Borough's part of the site alone, as the larger part of the site is in the London Borough of Hammersmith & Fulham. They also rejected the following options of:

- significant retail because of a) Westfield and b) a desire for regeneration to reinforce Earl's Court Road and North End Road in Hammersmith & Fulham, and
- 'status quo' is not an option and the site owners (Capital and Counties) have announced that once the volley ball is complete as part of the Olympics, the Earl's Court Exhibition Centre will cease to be and the Council understands that they have stopped taking bookings after this date.

3.5 Development Management Policies

3.5.1 The seven Strategic Objectives outlined above are supported by a number of Management Development Policies which will help to achieve the council's overarching vision and guide development across the Borough. These are included in **Table 11**.

Table 11: Core Strategy Development Management Policies

Strategic Objectives	Development Management Policies
Keeping Life Local	Social and Community Uses
	Local Shopping Facilities
	Walkable Neighbourhoods and Neighbourhood Facilities
Foster Vitality	Successful Town Centres
	Retail Development within Town Centres
	New Town Centre Uses
	New Town Centres
	Location of Business Uses
	Employment Zones
	Arts, Culture and Entertainment Uses
	The South Kensington Strategic Cultural Area
Better Travel Choices	Improving Alternatives to Car Use
	New Rail Infrastructure
An Engaging Public Realm	Street Network
	Street Form
	Street Life
	Streetscape

Strategic Objectives	Development Management Policies
	Parks, Gardens, Open Spaces and Waterways
	Trees and Landscape
	Servicing
Renewing the Legacy	Context and Character
	New Buildings and Extensions
	Smallscale Alterations and Additions
	Historic Environment
	Historic Assets
A Diversity of Housing	Housing Targets
	Housing Diversity
	Residential Amenity
	Estate Renewal
Respecting Environmental Limits	Climate Change (Carbon Reduction)
	Flooding
	Waste
	Biodiversity
	Air Quality
	Noise

4 Appraisal Methodology

4.1.1 This Chapter sets out the methodology for appraisal, as required by the SEA Directive:

The Environment report required under the SEA Directive should include:

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'

Annex 1 (h)

4.1.2 The appraisal was carried out using the revised SA framework as defined in the *Sustainability Appraisal Update Report*⁴ and included in **Table 7**. The revised SA Framework consists of 16 objectives against which the Core Strategy has been appraised.

4.1.3 The appraisal was a qualitative exercise based on the professional judgement of Scott Wilson. However, where possible, judgements were made taking into account evidence gathered at the Scoping Stage, further evidence that came to light in the *Sustainability Appraisal Update Report* (as outlined in **Chapter 2**) as well as other recent evidence.

4.1.4 The performance of the policies against each objective was given a score according to the criteria set out in **Table 12**.

Table 12: Scoring criteria

Scoring Symbol	Meaning
++	Significant positive benefit
+	Some positive benefit
0	No significant effect
X	Some adverse effect
XX	Significant adverse effect
?	Uncertain or insufficient information on which to determine

4.1.5 When determining the likely significance of effects, consideration was given to the characteristics of the effects and the sensitivity of the receptors involved. For example, the following can all determine whether effects may be significant:

- Probability, duration, frequency and reversibility of effects;
- Cumulative nature of effects;
- Magnitude and spatial extent of the effects; and
- Value and vulnerability of area likely to be effected.

4.1.6 This Sustainability Appraisal has focussed on identifying particular policies of the Core Strategy where there is an evident relationship between the Core Strategy and the SA objectives. It was

⁴ Sustainability Appraisal Update Report (February 2009) Royal Borough of Kensington and Chelsea

also identified when it was uncertain as to whether the outcome of the Core Strategy would result in a positive or negative impact on the SA objectives. These uncertainties are, in part, a result of the strategic nature of the Core Strategy and the uncertainty surrounding precisely how its policies would be implemented on the ground, as well as, the degree to which they would be achieved in practice. With this in mind, this appraisal was undertaken assuming the Core Strategy policies would be implemented in full as prescribed.

4.2 Difficulties encountered

- 4.2.1 A key issue in undertaking the appraisal of the Core Strategy was the strategic nature of the document and the uncertainty surrounding precisely how its ambitions would be implemented on the ground and the degree to which they would be achieved in practice (particularly since many different partners are involved in its delivery). A key assumption was made that the policies in the Core Strategy would be fully implemented (i.e. they were taken at 'face value'); however, having said this, where tensions between priorities were evident or it appeared clear that full implementation would be problematic, or involve trade-offs, we have done our best to highlight these.

5 Appraisal Findings

5.1 Introduction

5.1.1 This chapter sets out the findings from the appraisal of the Core Strategy. In particular the appraisal of the Strategic Objectives, Places, Strategic Sites and Development Management Policies.

5.1.2 The identification of significant effects is a requirement of the SEA Directive:

The SEA Directive requires '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; to be included in the environmental report.

Annex 1f, the SEA Directive

5.1.3 This chapter also sets out the mitigation measures identified during the appraisal. The mitigation of significant effects is a key requirement of the SEA Directive:

The SEA Directive requires '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' to be included in the environmental report.

Annex 1g, the SEA Directive

5.1.4 Mitigation measures are identified in detail in this chapter and then summarised further, and presented alongside proposal for monitoring, in **Chapter 7**. Many of the measures proposed are in the form of general recommendations or points for consideration, rather than measures designed to counter specific impacts.

5.2 Core Strategy Strategic Objectives Appraisal

5.2.1 This chapter provides the appraisal of the Core Strategy Strategic Objectives. It is important that the Strategic Objectives are in accordance with the Sustainability Objectives.

5.2.2 **Table 13** presents the results of the appraisal.

Table 13: Strategic Objectives Appraisal

SA Objectives			Core Strategy Objectives						
			Keeping Life Local	Fostering Vitality	Better Travel Choices	An Engaging Public Realm	Renewing the Legacy	A Diversity of Housing	Respecting Environmental Limits
Environment	1.	Biodiversity	0	?	0	+	+	?	+
	5.	Climate change	+	?	+	+	?	?	++
	6.	Flood risk	0	0	0	0	0	0	++
	7.	Air quality	+	?	+	+	0	?	+
	8.	Parks & open spaces	0	0	0	+	+	?	0
	9.	Pollution	+	?	+	+	?	?	?
	9a.	Previously developed land	0	?	0	?	?	?	?
	10.	Transport	++	+	++	+	0	?	0
	11.	Waste	0	0	0	0	0	0	++
	14.	Energy efficiency	0	?	0	0	+	+	+
	16.	Cultural heritage	0	+	0	+	++	?	?
Social	2.	Crime	0	0	?	+	0	0	0
	4.	Equalities	+	+	+	+	0	+	0
	12.	Community facilities	+	+	0	+	0	0	0
	13.	Housing	0	?	?	0	?	++	0
	15.	Health	++	0	0	0	0	0	0
Economy	3.	Economic growth	++	++	?	+	0	0	0

Keeping Life Local

Environment

- 5.2.3 The Strategic Objective's focus on local amenity value, particularly through social and community infrastructure is likely to provide secondary environmental benefits. The provision of community facilities within 'easy walk of most of the homes in the Borough' is likely to be compatible with SA objectives on climate change, air quality, pollution and transport.
- 5.2.4 The extent to which the Strategic Objective is compatible with SA objectives on biodiversity, parks and open spaces and previously developed land is not clear and would be dependent upon the detail of local and borough wide development proposals. Similarly, depending on the detailed design and construction plans of development proposals the performance of this Strategic Objective against the SA objectives on energy efficiency and cultural heritage is also uncertain.

Social

- 5.2.5 This Strategic Objective focuses towards the provision of community and social facilities to be within 5 minutes walk of the majority of the Borough. It is therefore compatible with SA objectives on equality, community facilities and health.

Economy

- 5.2.6 A focus on protecting and promoting local borough functions ensures compatibility with supporting a diverse and vibrant local economy to foster sustainable economic growth.

Fostering Vitality

Environment

- 5.2.7 The fostering vitality Strategic Objective aims to provide a 'wide variety of cultural, creative and commercial uses' and hence, given the strategic level of the objective it is difficult to accurately determine the compatibility of the Strategic Objective against the environmentally focussed SA Objectives. The focus on retail expansion and encouraging a greater number of small businesses could place pressure on local environmental resources and contribute to increased emissions in the Borough. Retaining and promoting large employers in higher order centres with good public transport infrastructure should in part mitigate any adverse impacts and this is reflected in compatibility with the transport SA objective to promote traffic reduction and encouraging more sustainable alternative forms of transport.
- 5.2.8 The extent to which energy efficiency through building design and the reuse of building and the recycling of building materials (energy efficiency) is encouraged is unclear.

Social

- 5.2.9 The Strategic Objective's focus on cultural, creative and commercial uses should result in compatibility with SA objectives on equalities and community facilities, assuming that these facilities are accessible to all.
- 5.2.10 The extent to which the SA Objective on housing can be met is unclear as a focus on retail expansion and provision of commercial space could place increasing pressure on competition for land and raise residential land prices in the Borough.

Economy

- 5.2.11 As expected, the Strategic Objective is compatible with the economic growth supporting a diverse and vibrant local economy given the focus on provision of varied retail and different sized commercial space across the Borough.

Better Travel Choices

Environment

- 5.2.12 An increase in cycling, walking and better provision and use of public transport should help promote traffic reduction and encourage more sustainable forms of transport and hence should lead to an improvement in local air quality and reduced air pollution. Furthermore, this Strategic Objective is likely to be compatible with minimising the effects on climate change through reduction in emissions.

Social

- 5.2.13 Improvements to street permeability and removal of barriers to movement should improve access throughout the Borough, particularly in the north of the Borough. This is compatible with the SA Objective on equalities.
- 5.2.14 It is possible that greater footfall generated by increased walking and cycling could lead to a reduction in crime, however, this would be dependent upon the particular measures to reduce crime to be incorporated within the detailed design.
- 5.2.15 The extent to which the housing needs of the Borough can be met is likely to be dependent on the delivery of the proposed new stations at Imperial Wharf and Kensal as delivery of such transport infrastructure should brought forward in parallel high density housing in these locations.

Economy

- 5.2.16 It is unclear as to the extent to which this Strategic Objective is compatible with the economic growth SA objective. Improved public transport and the removal of barriers for pedestrians to make the Borough a more attractive retail destination could help this sector; however, for businesses more dependent upon road infrastructure for their operations, this Strategic Objective may affect the operation of these businesses.

An Engaging Public Realm

Environment

- 5.2.17 Improving the street network and streetscape based on the Borough's historic patterns with a focus on high quality network of streets, squares and public spaces is likely to be compatible with the SA Objectives on biodiversity, climate change, parks and open spaces, transport and cultural heritage. New street trees and improving existing open spaces should also contribute to improving air quality in the Borough and reducing air pollution.
- 5.2.18 The extent to which regeneration is focussed on previously developed land is not clear, however, it would be expected that where possible, previously developed land not designated for future building be returned to public amenity use with a focus on green infrastructure.

Social

- 5.2.19 An improved public realm is likely to be compatible with the SA Objectives on crime, equalities and community facilities.

Economy

- 5.2.20 The proposal to link the Portobello road and Golborne Road markets as well as the proposed improvements to the public realm should further increase the attractiveness of these areas as place to live, work and visit. Such developments should continue to attract a variety of different businesses and help maintain the diversity of the local economy.

Renewing the Legacy

Environment

- 5.2.21 This Strategic Objective clearly identifies the importance of the Borough's quality built and natural environment as a key element to the long-term success of the Borough. The priority to preserve and enhance existing buildings and specify high design quality for new buildings should ensure compatibility with SA Objectives on energy efficiency cultural heritage. The creation of new conservation areas should also conserve and enhance biodiversity and enhance the Borough's parks and open spaces.
- 5.2.22 The extent to which development is prioritised on previously developed land or the extent to which it would minimise the effects on climate change are unclear as they would be dependent on specific location and design.

Social

- 5.2.23 There is no relationship between this Strategic Objective and the crime, equalities, community facilities and health SA objectives. Regarding housing, some conflict may arise in ensuring the housing needs of residents are met in terms of total housing provision and affordability and the aim to preserve and enhance existing buildings.

Economy

- 5.2.24 It is not envisaged there is a relationship between this objective and the SA objective on economic growth.

A Diversity of Housing

Environment

- 5.2.25 The Strategic Objective's focus on housing delivery raises a degree of uncertainty across the majority of the environmentally focussed SA Objectives. Significant new development has the potential to place additional pressures on the local environment. Specific mention to deliver high quality homes, in particular a focus on more Lifetime Homes should, however, result in compatibility with the energy efficiency SA objective. The extent to which this Strategic Objective would be compatible with the other environmentally focussed SA objectives can not be effectively determined at this level.

Social

- 5.2.26 A focus on the diversity of housing appropriate to need and demand and specific reference to an increase in family sized affordable homes and Lifetime Homes is compatible with the Borough meeting the housing needs of its residents and also the equalities SA objectives to encourage social inclusion, equity and the promotion of equality.

Economy

- 5.2.27 It is not envisaged that there is a relationship between this Strategic Objective and the SA Objective on economic growth.

Respecting Environmental Limits

Environment

- 5.2.28 This Strategic Objective is compatible with the environmentally focussed SA objectives. Its particular focus on climate change mitigation and adaptation elements including a variety of measures to reduce the risk of flooding is likely to result in a significant positive effect for the climate change and flood risk SA Objectives. Recognition of the importance of green spaces and rivers should also help to achieve compatibility with the SA objective to conserve and enhance biodiversity.
- 5.2.29 Delivery of carbon neutral developments, highlighting the potential of a district heat and power network and a focus on waste reduction and the waste hierarchy should result in compatibility with the SA Objectives on air quality, pollution, waste and energy efficiency.
- 5.2.30 It is unclear how the Strategic Objective is compatible with the cultural heritage SA Objective to reinforce local distinctiveness, or whether development would be prioritised on previously developed land.

Social

- 5.2.31 This Strategic Objective is unlikely to have any effect on the socially focussed SA Objectives.

Economy

- 5.2.32 It is not envisaged that there is a relationship between this objective and the SA objective on economic growth.

5.3 Core Strategy Places

- 5.3.1 The section presents the appraisal of the Core Strategy's Places.
- 5.3.2 **Table 14** presents the results of the appraisal.

Table 14: Places Appraisal

SA Objectives		Core Strategy Places													
		Kensal	Golborne / Trellick	Latimer	Earl's Court	Lots Road/ World's End	Westway	Notting Hill Gate	Portobello / Notting Hill	Knights-bridge	South Kensington	King's Road / Sloane Square	Kensington High Street	Brompton Cross	Fulham Road West
Environment	1. Biodiversity	+	+	0	+	+	0	0	0	0	0	0	0	0	+
	5. Climate change	++	+	+	++	+	0	+	0	0	0	0	0	0	0
	6. Flood risk	0	0	0	0	?	0	0	0	0	0	0	0	0	0
	7. Air quality	0	+	0	+	+	0	+	0	+	?	+	+	+	?
	8. Parks & open spaces	+	+	+	+	+	+	0	0	+	+	+	+	+	+
	9. Pollution	+	0	?	+	+	0	+	0	+	0	+	+	+	0
	9a. Previously developed land	+	+	+	+	+	+	+	+	+	+	+	+	+	+
	10. Transport	++	+	+	+	++	+	+	+	+	+	+	+	+	+
	11. Waste	+	0	0	0	0	0	0	+	0	0	0	0	0	0
	14. Energy efficiency	+	+	0	++	0	0	+	0	0	0	0	0	0	0
16. Cultural heritage	++	+	0	+	+	0	+	+	+	++	+	+	+	+	
Social	2. Crime	0	0	0	0	+	+	0	0	0	0	0	0	0	0
	4. Equalities	+	0	0	0	0	0	0	0	0	0	0	0	0	0
	12. Community facilities	+	+	++	+	+	+	+	+	+	+	+	+	+	+
	13. Housing	+	?	?	++	+	+	+	+	0	0	+	0	+	+
	15. Health	+	0	?	+	?	+	0	+	0	0	+	0	0	0
Economy	3. Economic growth	++	+	+	+	+	+	+	+	++	+	+	++	+	+

Kensal

- 5.3.3 Kensal as a place has shown significant positive impacts on climate change, transport and cultural heritage environmental SA objectives and positive impacts for the majority of remaining environmental SA objectives. The majority of social SA objectives showed positive impacts. The economy SA objective showed a significant positive impact.

Golborne / Trellick

- 5.3.4 The potential opportunities for Golborne / Trellick have shown positive impacts for the majority of environmental SA objectives. The community facilities social SA objective showed a positive impact, while the impact of the housing SA objective was uncertain. This uncertainty exists as the Council is carrying out a review of various housing options. At this stage until case studies are tested it is difficult to determine whether the housing needs of the Royal Borough's residents are met. The economy SA objective showed a positive impact.

Latimer

- 5.3.5 Latimer as a place has shown positive impacts on climate change, parks & open spaces, previously developed land and transport SA objectives. The pollution environmental SA objective showed an uncertain impact. The uncertainty surrounds whether the air quality, dust and noise problems that are significant issues in this part of the Borough because of the Hammersmith and City railway line (which is above ground), the Westway flyover, and the West Cross route will improve as they are out of the Council's control. The community facilities social SA objective has shown significant positive impacts, while the impacts for the housing and health objectives are uncertain. This uncertainty for the housing SA objective exists as the Council is carrying out a review of various housing options. At this stage until case studies are tested it is difficult to determine whether the housing needs of the Royal Borough's residents are met. The uncertainty for the health SA objective is surrounding whether health facilities will be required and included among community facilities. The economy SA objective showed a positive impact.
- 5.3.6 ***Recommendation: the Council should support initiatives set out in the Air Quality Action Plan and encourage proposals and design solutions which will improve air quality through low emission strategies.***

Earl's Court

- 5.3.7 The potential opportunities for Earl's Court have shown significant positive impacts on climate change and energy efficiency environmental SA objectives and positive impacts for the majority of remaining environmental SA objectives. The housing social SA objective has shown significant positive impacts and positive impacts for the community facilities and health SA objectives. The economy SA objective showed a positive impact.

Lots Road / Worlds End

- 5.3.8 Lots Road / Worlds End as a place has shown significant positive impacts for the transport environmental SA objective and positive impacts for the majority of remaining environmental SA objectives. However, there are uncertain impacts shown for the flood risk SA objective. This uncertainty surrounds the potential flood risk to the area. The majority of social SA objectives showed positive impacts. The health social SA objective showed an uncertain impact. The uncertainty for the health SA objective is surrounding whether health facilities will be required and included among community facilities. The economy SA objective showed a positive impact.

- 5.3.9 **Recommendation: Any development in this area needs to consider the potential flood risk of the River Thames.**

Westway

- 5.3.10 The potential opportunities for the Westway have shown positive impacts for the parks & open spaces, previously developed land and transport SA objectives. The majority of social SA objectives showed positive impacts. The economy SA objective showed a positive impact.

Notting Hill Gate

- 5.3.11 Notting Hill Gate as a place has shown positive impacts for the majority of environmental SA objectives. The community facilities and housing social SA objectives showed a positive impact. The economy SA objective showed a positive impact.

Portobello / Notting Hill

- 5.3.12 The potential opportunities for Portobello / Notting Hill have shown positive impacts for the previously developed land, transport, waste and cultural heritage environmental SA objectives. The majority of social SA objectives showed positive impacts. The economy SA objective showed a positive impact.

Knightsbridge

- 5.3.13 Knightsbridge as a place has shown positive impacts for the majority of environmental SA objectives. The community facilities social SA objectives showed a positive impact. The economy SA objective showed a significant positive impact.

South Kensington

- 5.3.14 The potential opportunities for South Kensington has shown significant positive impacts for the cultural heritage environmental SA objective and shown positive impacts for the parks & open spaces, previously developed land and transport SA objectives. The air quality environmental SA objective showed an uncertain impact. Air quality is a significant issue in this part of the Borough because of high traffic levels on Cromwell Road; however no measure is suggested to improve this. The community facilities social SA objectives showed a positive impact. The economy SA objective showed a positive impact.

- 5.3.15 **Recommendation: the Council should support initiatives set out in the Air Quality Action Plan and encourage proposals and design solutions which will improve air quality through low emission strategies.**

Kings Road / Sloane Square

- 5.3.16 Kings Road / Sloane square a place has shown positive impacts for the majority of environmental SA objectives. The majority of social SA objectives showed positive impacts. The economy SA objective showed a positive impact.

Kensington High Street

- 5.3.17 The potential opportunities for Kensington High Street have shown positive impacts for the majority of environmental SA objectives. The community facilities social SA objectives showed a positive impact. The economy SA objective showed a significant positive impact.

Brompton Cross

- 5.3.18 Brompton Cross as a place has shown positive impacts for the majority of environmental SA objectives. The community facilities and housing social SA objectives showed positive impacts. The economy SA objective showed a positive impact.

Fulham Road West

- 5.3.19 The potential opportunities for Fulham Road West have shown positive impacts for the biodiversity, parks & open spaces, previously developed land, transport and cultural heritage environmental SA objectives. The air quality environmental SA objective showed an uncertain impact. Air quality, from the volume of traffic, is a particular concern; however no measure is suggested to improve this. The community facilities and housing social SA objectives showed positive impacts. The economy SA objective showed a positive impact.
- 5.3.20 ***Recommendation: the Council should support initiatives set out in the Air Quality Action Plan and encourage proposals and design solutions which will improve air quality through low emission strategies.***

5.4 Core Strategy Strategic Sites Appraisal

- 5.4.1 This section provides the appraisal of the Core Strategy Strategic Sites.
- 5.4.2 **Table 15** presents a summary of the results of the appraisal with a more detailed appraisal contained in **Appendix 2**.

Table 15: Strategic Sites Appraisal

SA Objectives			Core Strategy Strategic Sites						
			Kensal Gasworks	Wornington Green	Land adjoining Trellick Tower	North Kensington Sports Centre	The former Commonwealth Institute	Warwick Road	Earl's Court
Environment	1.	Biodiversity	?	+	?	?	?	?	?
	5.	Climate change	++	+	?	?	?	?	?
	6.	Flood risk	0	?	0	?	0	?	?
	7.	Air quality	?	0	?	?	?	?	?
	8.	Parks & open spaces	?	+	0	?	0	+	0
	9.	Pollution	+	0	?	?	?	0	?
	9a.	Previously developed land	+	++	++	++	+	+	+
	10.	Transport	+	?	?	?	?	?	?
	11.	Waste	+	0	?	0	?	?	?
	14.	Energy efficiency	+	+	+	?	+	?	?
	16.	Cultural heritage	0	0	?	0	+	?	0
Social	2.	Crime	+	+	?	+	?	?	?
	4.	Equalities	?	+	?	+	+	+	+
	12.	Community facilities	++	+	+	++	+	+	0
	13.	Housing	+	+	+	+	0	+	+
	15.	Health	?	+	?	+	0	?	0
Economy	3.	Economic growth	+	+	+	0	+	+	+

Kensal Gasworks

Environment

- 5.4.3 The aim to deliver an 'exemplary environmentally responsive mixed use development' should ensure a positive outcome for the climate change, waste and energy efficiency SA Objectives... In particular, if an environmentally responsive medium rise high density development of no less than 2000 dwellings in close proximity to good public transport is brought forward, then this should ensure a significantly positive outcome for minimising the effects on climate change. The potential to provide on-site waste management facilities could enable a positive outcome for the waste SA objective and the energy efficiency SA objectives is also likely to be positive with the reuse of the on-site Sainsbury's and implementation of good building design.
- 5.4.4 The availability of previously developed land on-site should ensure that the proposal performs well against this SA objective, however, the impact of the development on the Borough Grade I and Grade II Sites of Nature Conservation Importance within the site boundary is unknown at this stage and hence the outcome on biodiversity is uncertain.
- 5.4.5 The focus on improved public realm around the canal side should ensure that the proposal performs well against the biodiversity and parks and open spaces SA Objectives, however, at this stage no details are available to confirm this.
- 5.4.6 The decommissioning of the gas holders and land decontamination should improve the environmental quality of the area, when undertaken, and hence, enable a positive outcome for the SA objective on pollution.
- 5.4.7 The site is poorly connected to existing public transport infrastructure, particularly at the western end of the site and the successful delivery of no less than 2000 new dwellings is dependent on the provision of a Crossrail station. A Crossrail station or other improved public transport providing realistic alternative sustainable transport choices should help achieve positive outcomes to the transport SA Objective. Improved accessibility northwards to Kensal Green and south across the mainline railway would also help work towards achieving this Objective.
- 5.4.8 **Recommendations:**
- ***include Borough Grade I and II Sites of Nature Conservation Importance in the constraints section, and***
 - ***the green corridors identified on the environmental constraints map should be preserved and/or enhanced and also highlighted in the constraints section of the site plan.***

Social

- 5.4.9 The site's surrounds contain high levels of employment, income and housing deprivation and this is reflected in the understanding that the Gasworks holds the key to significant regeneration in North Kensington. The provision of social and community uses at the site and improvement to the quality of the public realm, as well as the identified s106 requirements for affordable housing contribution (if not provided as part of the development) should help deliver a positive response to the Social SA Objectives, particularly the SA Objectives on community facilities and housing.
- 5.4.10 An improved public realm, with increased permeability both north and south of the site combined with likely increased footfall should help achieve a positive outcome for SA Objective to reduce crime and the fear of crime.

- 5.4.11 Uncertainty over the extent of social and community infrastructure and provision of accessible health care meant that the outcome for the equalities and health SA Objectives was largely unknown.

Economy

- 5.4.12 Provision of additional retail and business space should help improve the diversity and vibrancy of the local economy. This would be further enhanced by the provision of improved transport infrastructure enabling greater accessibility to the site.

Wornington Green

Environment

- 5.4.13 Overall, the proposed redevelopment at Wornington Green should deliver positive environmental improvements to the site, particularly if the site-specific s106 agreements to, among others, reinstate an improved Athlone Gardens and improve walking and cycling accessibility are delivered. The identified need for a site management plan should ensure protection of the tree preservation orders in the north west of the site; and the reprovision of and equal if not larger new park should enable a positive outcome for the biodiversity and parks and open spaces SA Objectives. A commitment to undertake redevelopment as quickly as possible and maintain good quality open space throughout the construction period, in addition to a construction traffic management plan should also help maintain good local environmental quality.
- 5.4.14 The extent to which effects on climate change would be reduced are dependent on detailed design, however, improvements to Decent Homes Standards should deliver positive benefits against the SA Objective on climate change and energy efficiency.
- 5.4.15 The site was identified to have a high risk of surface water flooding in the sequential test and will require mitigation.
- 5.4.16 Identified s106 requirement on permit free parking may encourage greater car ownership, and hence, there is uncertainty as the outcome of the SA Objective on transport.
- 5.4.17 ***Recommendation: the flood risk of the site should be identified as a constraint.***

Social

- 5.4.18 This site and its surrounds is within the top 10% of employment, income, housing and crime deprivation and multiple deprivation nationally. Hence, the proposed redevelopment, with provision of leisure and community facilities and tertiary education facilities could help address these issues.
- 5.4.19 The specific redevelopment priority to keep the community together, as well as, the identified s106 requirements and proposals for improved social and community infrastructure should help facilitate greater social inclusion and community cohesion and result in positive outcomes for the SA Objectives on equalities and community facilities. Improvements in the building fabric to Decent Homes Standards and additional housing provision (both private and affordable) should assist the Royal Borough in meeting its housing need and the needs of residents and result in a positive outcome for the housing SA Objective.
- 5.4.20 The provision of a Safer Neighbourhood Police Base in the area should help reduce crime and the fear of crime.

Economy

- 5.4.21 The proposed leisure and community facilities and the identified s106 construction training contribution should provide some stimulus to the local economy and result in a positive response to support the local economy and foster economic growth.

Land adjacent to Trellick Tower

Environment

- 5.4.22 The development of this site contains little information to appraise its impact on many of the environmental SA objectives, apart from a significant positive outcome for the SA objective prioritising development on previously developed land and positive outcome for the SA objective to encourage energy efficiency. There are no identified environmental constraints on the site, although there are Grade II* listed buildings adjoining the north and west sides of the site and a site of local importance for nature conservation adjoining the north of the site.

- 5.4.23 ***Recommendation: the listed buildings constraints should be considered in any design of the new development.***

Social

- 5.4.24 The delivery of a minimum of 60 residential units to fund regeneration including improvements to social and community facilities is likely to bring positive outcomes for the SA Objectives on equalities, community facilities, housing and health, however, a lack of detailed information means that an effective appraisal was difficult. The development site is within the top 10% in terms of crime, housing, income deprivation and multiple deprivation and therefore, positive redevelopment at the site should have beneficial improvements to the local community.

- 5.4.25 ***Recommendation: that the design of the development considers community safety.***

Economy

- 5.4.26 The proposal to accommodate studio workspace units should help increase economic growth in the immediate area. The extent to whether it diversifies the local economy would be dependent upon the nature of businesses take-up.

North Kensington Sports Centre

Environment

- 5.4.27 The proposed allocation of development on the site is devoid of all references to environmental constraints. The proposed development is likely to include development on previously developed land; however, the extent of development on the existing open space is unclear. No details are provided about management of the Grade II listed building to the north of the site. The site has relatively poor transport accessibility, particularly with regards to the existing road network. An improved street network and better permeability would be required if a new secondary school were to be provided on the site, however, depending on the delivery of the identified s106 contributions towards improving public transport access and traffic management plans, there could be a perverse trend towards greater personal car use in the area. It is not clear as to the likely sustainability credentials of the proposed new infrastructure.

- 5.4.28 The site was identified to have a high risk of surface water and sewerage flooding in the sequential test and will require mitigation.

- 5.4.29 ***Recommendation: the flood risk of the site should be identified as a constraint.***

Social

- 5.4.30 The proposed site development has a strong positive social element including a new secondary school with sports facilities and re-provision of the existing sports facilities that should result in positive outcomes for all the Social SA Objectives, in particular, through the identified s106 requirements to provide dual use sports facilities and contributions towards social and health infrastructure. The site surrounds are in the top 10% nationally of crime, housing, and multiple deprivation and positive development in the area should help improve housing availability and potentially reduce crime and fear of crime through greater footfall and improved street network permeability.

Economy

- 5.4.31 No effects identified.

The former Commonwealth Institute

Environment

- 5.4.32 Reuse and enhancement of the existing building with the aim to develop it into a high trip generating arts and cultural use should result in positive outcome for the SA Objectives on previously developed land, energy efficiency and cultural heritage. The degree of positive performance will be dependent upon the detailed project plans. There is uncertainty regarding the impact of the proposed development on local biodiversity and the natural environment, however, the identified constraints of the site should ensure any development is delivered in the context of full local environmental understanding. The extent to which the project will contribute to reducing effects on climate change, reduce pollutants and reduce waste is unknown; however, efforts should be made to discourage visitors travelling to the Institute by car.

Social

- 5.4.33 The project should help contribute to positive improvements on the SA Objectives on equalities and community facilities, assuming that the facilities are open and accessible to all. Impacts of the development on local crime levels is uncertain.
- 5.4.34 ***Recommendation: that the design of the development considers community safety.***

Economy

- 5.4.35 The site proposal should have positive impacts on employment and the local economy, however, the extent to these impacts is uncertain at this stage.

Warwick Road

Environment

- 5.4.36 The five sites including 100 West Cromwell Road propose a variety of development including residential, commercial, community and social and open amenity space provision. The precise nature and balance of this delivery is not clear, however, it is likely that there would be positive effects on the parks and open spaces and previously developed land SA objectives given the identified site specific s106 requirements for public open space and landscaping improvements. The nature of the developments on the other SA objectives is unclear without further detailed design data.
- 5.4.37 Areas of the site were identified to have a high risk of surface water and/or sewerage flooding in the sequential test and will require mitigation.

5.4.38 **Recommendation: the flood risk of the site should be identified as a constraint.**

Social

5.4.39 The identified site specific s106 requirements focus on the provision of social infrastructure including a primary school, affordable housing and community and social infrastructure amongst others. Based on this, delivery of the development at the Warwick Road sites is likely to have positive effects on the SA Objectives on equalities, community facilities and housing. The area experiences high levels of housing deprivation and therefore measures to increase housing delivery in this area are welcomed. The extent to which crime would be reduced or whether additional health care facilities are to be provided is not clear.

5.4.40 **Recommendation: that the design of the development considers community safety.**

Economy

5.4.41 The proposed developments should cumulatively deliver a variety of retail, leisure, community and business use facilities which should aid in supporting and developing the local economic base.

Earl's Court

Environment

5.4.42 There is very little information regarding the environmental elements of the proposed development other than the appreciation that the site will be developed on previously developed land. The continued use as an exhibition centre as well as provision of office space and residential units has identified the opportunity for establishing a district heating scheme which could help minimise the proposed development's impacts on climate change. A Grade I Borough Site of Nature Conservation Importance is identified at the south west of the site and therefore development round this site should be carefully managed and should be identified as a constraint. The whole site and its surrounds is identified as 'open space deficient'. The identified s106 requirement to help 'unravel' the Earl's Court One Way System should help improve local environmental quality and potentially reduce local air pollution.

5.4.43 The site was identified to have a high risk of surface water and sewerage flooding in the sequential test and will require mitigation.

5.4.44 **Recommendations:**

- **should identify the Grade I Borough Site of Nature Conservation Importance as a constraint and also should consider ways to create biodiversity – green roofs, etc. within the development. Open space of some form should also be considered, especially for the residential component, and**
- **the flood risk of the site should be identified as a constraint.**

Social

5.4.45 Continued use of Earl's Court as an exhibition centre should enable a positive effect on the equalities SA objective if accessible to all members of society. Delivery of residential units would help in meeting the housing needs of the Borough's residents in an area in the top 10% most deprived in terms of housing deprivation. This should be further improved if the identified s106 requirement for affordable housing is agreed. It is unlikely that the development would have any effect on the community facilities and health SA objectives. The extent to which crime would be reduced is not clear.

5.4.46 **Recommendation: that the design of the development considers community safety.**

Economy

5.4.47 The proposed development should help support the local economy, in particular if the potential for office space provision is realised. Just to the south of the site lies an area in the top 10% most deprived in terms of employment and any additional job creation in the area should help improve this situation.

5.5 Core Strategy Development Management Policies

5.5.1 This section presents the appraisal of the performance of the Development Management Policies. The policies have been appraised individually and the performance of the policies has been discussed according to the grouping of policies under each Strategic Objective. Individual policies are individually highlighted when particular issues require further clarification.

5.5.2 In total, there are 35 strategic policies presented under the seven Core Strategy themes. The full list of strategic policies is included in **Table 11**.

5.5.3 The SA of the Development Management Policies against the SA objectives is presented in **Table 16** and provides an overview of the performance of the strategic policies against the SA objectives and identifies where the strategic policies are not achieving the aims of the SA objectives.

5.5.4 A discussion on the performance of the Development Management Policies also refers to findings of the SA Update Report which identified three objectives where there were some baseline indicators that had shown to have worsened since the publication of the Sustainability Appraisal Scoping Report in 2005. These were:

- Objective 1. Biodiversity - To conserve and enhance the natural environment and biodiversity;
- Objective 2. Crime - Reduce crime and anti-social behaviour and the fear of crime; and
- Objective 13. Housing - To aim that the housing needs of the Royal Borough's residents are met.

Keeping Life Local

- 5.5.5 The vision for Keeping Life Local is *‘for social and community facilities to be widely available and for neighbourhood functions – including local shopping facilities – to be accessible so that residential communities can flourish’*.
- 5.5.6 Overall, the Development Management Policies perform well against each of the environmental, social and economic SA objectives. Impacts are predominantly positive including some significant benefits identified, in particular against those objectives which have a climate change, social/community and economy focus. These include the SA objectives on economic growth, equalities, climate change, air quality, transport and community facilities.
- 5.5.7 None of the Development Management Policies were identified to result in an adverse impact on the SA objectives; however the effect on some SA objectives particularly surrounding the proposed development plans was unclear. As there was no detailed information within the policy or related supporting information specific to development or location, for example, whether development was to be prioritised on previously developed land etc. the outcome of these policies could be either positive or negative dependent upon further information and implementation. One particular area highlighted by this initial appraisal is the uncertainty of meeting the housing SA objective. This uncertainty stems from the focus on social and community infrastructure and its balance with residential development. Similarly, the uncertainty of the nature of development is reflected in the Environmental SA objectives on biodiversity and previously developed land.
- 5.5.8 For the Development Management Policy: Walkable Neighbourhoods and Neighbourhood Facilities, the detailed reference to ‘as detailed in 2.2.7’ could not be found – the policy has been appraised based on the assumption that neighbourhood facilities would be within walking or cycling distance for the majority of residents.

Fostering Vitality

- 5.5.9 The vision for Fostering Vitality is *‘that the quality of life of our predominantly residential borough is enhanced by a wide variety of cultural, creative and commercial uses that significantly contribute to the well being of residents and to the capital’s role as a world city’*.
- 5.5.10 The Development Management Policies generally perform well even against the environmentally focussed SA objectives given the strong development focus of these policies. Development Management Policy: New Town Centre Uses, in particular, performs well against the environmental SA objectives. This stems principally from the focus of development to existing higher order centres which are likely to be easily accessible by public transport. Development Management Policy: Successful Town Centres also performs relatively well across each of the environmental, social and economic SA objectives.
- 5.5.11 Development Management Policy: Employment Zones is likely to provide positive economic benefit not at the expense of environmental or social SA objectives.
- 5.5.12 Development Management Policy: Location of Business Uses performs particularly strongly against the air quality and transport SA objectives. Consolidating and locating key employment uses in areas of high public transport accessibility could significantly help improve local air quality, reduce traffic and emissions from traffic. This policy, however, may have a negative

impact on the economic SA objective to support a diverse and vibrant local economy by polarising employment in certain areas and potentially impact on more local services and employment provision. However, by maintaining that this applies only to “large” employment uses should mitigate any potential impact.

- 5.5.13 The SA objective on housing is likely to be negatively impacted by Successful Town Centres policy. The Location of Business Uses Policy has also been identified as to potentially result in a negative effect on the SA objective on supporting a diverse and vibrant local economy.
- 5.5.14 The appraisal of Development Management Policy: New Town Centres resulted in several uncertainties regarding its impact on the Environmental SA objectives. Principally, this uncertainty arises from a lack of detail regarding development’s impact on the environment. In contrast, this policy performs well against the Social SA objectives.
- 5.5.15 Development Management Policy: Retail Development within Town Centres could not be appraised against the SA objectives as it simply supports other policies.
- 5.5.16 The Employment Zones policy which focuses on maintaining the status quo of the identified industrial zones for light industrial uses should also help to support the SA objective on economic growth, without any significant impacts on either of the environmental or social focussed objectives.

Better Travel Choices

- 5.5.17 Better Travel Choices are *‘for walking, cycling and public transport to be safe, easy, and attractive and preferred to private car ownership and use’*.
- 5.5.18 In general, these Development Management Policies are likely to provide an overwhelming environmental benefit as well as ensuring positive impacts on social inclusion and access through the provision of improved walking, cycling and public transport improvements.
- 5.5.19 Both Development Management Policies focus on improving provision of and access to public transport whilst simultaneously discouraging the use of private car ownership. Hence they perform particularly well against the following SA objectives:
- 5. Climate Change – Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables and adopt measures to adapt to climate change;
 - 7. Air Quality – Improve air quality in the Royal Borough; and
 - 10. Transport – To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic.
- 5.5.20 Noticeable positive improvements are also likely for the biodiversity SA objective to conserve and enhance the natural environment and biodiversity and the air quality objective to improve air quality in the Royal Borough.
- 5.5.21 The policy on New Rail Infrastructure is likely to have a positive impact at the strategic level, however, in consideration of the Tactical Policy detail; there is the potential for negative impacts on the SA objective to prioritise development on previously developed land. The result of this would be dependent on the location of proposed new infrastructure.

- 5.5.22 Neither of the “Better Travel Choices” policies were deemed to have direct positive or negative impacts on the economic SA objective to support a diverse and vibrant local economy to foster sustainable economic growth, however, there are likely to be significant indirect economic benefits to the local communities and wider borough through improved connectivity and associated service provisions in those areas identified.

An Engaging Public Realm

- 5.5.23 The vision of A Quality Public Realm *‘is to endow a strong local sense of place by maintaining and extending to all parts of the borough our high quality public realm’*.
- 5.5.24 Overall, the Development Management Policies perform well against the SA objectives. In terms of positive environmental benefits, the Parks, Gardens, Open Spaces and Waterways and Trees and Landscape policies perform well, particularly against the environmental SA objectives which focus on providing protection, enhancement and creation of the natural environment.
- 5.5.25 The majority of the Development Management Policies perform well with regards to the SA objective to reinforce local distinctiveness and enhance of cultural heritage which marries well with the fundamental vision of An Engaging Public Realm. In particular, the Street Network and Street Form policies show significant benefits.
- 5.5.26 The policies also perform well in terms of the Social SA objectives. The SA objective to reduce crime (specifically, Policy: Street Network, which highlights designs to minimise opportunities for crime) and the SA objective on equalities. This is as a result of the nature of the policies which focus on delivering a high quality public realm to include improved accessibility and connectivity and preservation of and greater public access to natural settings such as parks and waterways.
- 5.5.27 The policy on Street Life performs well against both social and economic SA objectives without any evident adverse environmental impacts (at the level of this analysis).
- 5.5.28 There are only four cases where the outcome of the policy could potentially be either positive or negative depending on the detail of the policy or the manner of its implementation. The impact of the Street Network and Servicing policies could not be clearly established against the transport SA objective. The focus of these policies may not necessarily be conducive to promoting traffic reduction or improving road safety.

Renewing the Legacy

- 5.5.29 Renewing the Legacy aims *‘to take great care to conserve the superb built environment we have inherited and to ensure that where new development takes place it enhances the borough’*.
- 5.5.30 The Royal Borough of Kensington and Chelsea benefits from a variety of attractive buildings, parks and gardens. The Borough enjoys numerous listed buildings, areas of historic interest and protected areas and combined provide the unique and valuable character of the Borough.
- 5.5.31 Overall, the policies perform well against the SA objectives, in particular, the policies on Context and Character and New Buildings and Extensions. A focus on only permitting *‘new buildings and extensions of the highest architectural ... quality’* sensitive to the existing local context should help contributing to meeting the aims of “Renewing the Legacy”.

5.5.32 The nature of existing buildings may not be conducive to improvements in their environmental performance and the stringent requirements of policy: Smallscale Alterations and Additions casts doubt over the potential environmental friendliness of these developments. In other words – will the need to maintain the character and appearance of existing buildings restrict the opportunities for the installation of greater energy efficiency measures in such properties. Furthermore, stringent conditions defined in the policy on New Buildings and Extensions and the policy on Smallscale Alterations and Additions may not be conducive to ensuring the housing SA objective is met. The housing SA objective was highlighted in the update to the Scoping Report to have worsened.

5.5.33 Unsurprisingly, all the policies perform well against the cultural heritage SA objective to reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage.

5.5.34 The Development Management Policies were not identified to have clear impact on the economic SA objective.

A Diversity of Housing

5.5.35 The vision for Diversity in Housing *'is to have a diversity of housing at a local level, built for adaptability and to a high quality, and which can cater for a variety of housing needs'*.

5.5.36 The policy on Diversity of Housing, as expected, generally performed well against the socially focussed SA objectives, however, due to a lack of detail on the environmental performance criteria within the policies or the tactical policy detail it was not possible to ascertain any link between the policy and the environmental SA objectives. Where a correlation was identified, the outcome was in three out of the four cases, was uncertain (due to lack of detail).

5.5.37 In terms of the SA Objective on housing, which was identified to be underperforming in the Scoping Report update report, the policies generally perform well, in particular with regards to the policy on Estate Renewal. This was due to high pressure on housing affordability within the Borough.

5.5.38 The policies also perform well against the SA objective on equalities to *encourage social inclusion (including access), equity, the promotion of equality and a respect for diversity* by clearly setting out the criteria for housing mix, requirements for affordable housing provision.

5.5.39 The Development Management Policies were not identified to have clear impact on the Economic SA objective.

Respecting Environmental Limits

5.5.40 Respecting Environmental Limits means *'contributing to the mitigation of, and adaptation to, climate change; significantly reducing carbon dioxide emissions; maintaining low and further reducing car use; carefully managing flood risk and waste; protecting and attracting biodiversity; and improving air and noise quality within the borough'*.

5.5.41 Given that the focus of the Development Management Policies is on "Respecting Environmental Limits", it was expected that these policies would perform better against the environmentally focussed SA objectives. In general the policies do perform well, however, the appraisal did raise

a number of question marks highlighting the potential for negative impacts on the SA objectives if not carefully detailed and/or implemented. The policies perform particularly well against the SA objectives on biodiversity and climate change.

- 5.5.42 The appraisal identified that the benefits to the environment are unlikely to constrain the social or economic SA objectives, however, the policies on Flooding and Climate Change (Carbon Reduction) could have either a positive or negative impact on the crime and housing SA objectives depending on their detail and/or the manner of their implementation.
- 5.5.43 The Development Management Policies were not identified to have clear impact on the Economic SA objective.

6 Conclusions and Monitoring

6.1 Introduction

6.1.1 This chapter aims to bring together the main findings of the SA. Firstly, **Table 16** sets out a consideration of cumulative effects in terms of each of the SA objectives. Following this, **Table 17** identifies those SA objectives that are most likely to be at risk of significant negative effects and makes recommendations with regard to monitoring such effects. Finally, there is a short conclusion on the outcomes of the SA process.

6.1.2 Monitoring significant effects is a key requirement of the SEA Directive:

The SEA Directive states that 'member States shall monitor the significant environmental effects of the implementation of plans and programmes'.

Article 10, the SEA Directive

'Monitoring allows the actual significant effects of implementation of the SPD to be tested against those predicted in the SA'.

Section 4.3.21, Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, DCLG, 2005

Cumulative effects

6.1.3 The Strategic Objectives provide the strategic level delivery mechanism for the overarching Core Strategy Vision. Correspondingly, the Development Management Policies provide the detail to facilitate their effective implementation. From **Table 16** it is possible to get an idea of which sustainability objectives might be at risk as a result of a number of policies acting cumulatively to generate a significant negative effect. However, the table cannot tell the whole story, **Table 17** sets out a short discussion on the potential for cumulative effects of the Development Management Policies and Strategic Sites in terms of each SA objective.

Table 17: Cumulative effects discussion

SA Objectives		Cumulative effect
Environment	Biodiversity	<p>The majority of the Development Management Policies are likely to have a negligible effect in terms of biodiversity, however, the Parks, Gardens and Open Spaces and Biodiversity policies are likely to have significant positive effects. In general policies grouped under Renewing the Legacy and Respecting Environmental Limits perform well and are likely to deliver a positive outcome. The relationship between this SA objective and policies grouped under Keeping Life Local, Fostering Vitality, and Respecting Environmental Limits is in parts uncertain. Overall policies are identified as generally taking a positive approach to biodiversity; however the effect of some policies remains uncertain until more detailed information is available.</p> <p>The majority of the strategic sites show uncertain impacts for biodiversity, due to lack of detailed information in current proposals.</p>
	Climate change	<p>The Development Management Policies are all identified to have negligible or positive effects on climate change. In particular, the policies grouped under Keeping Life Local, Better Travel Choices and Respecting Environmental Limits are likely to have an overall positive impact on climate change. Individual policies such as Walkable Neighbourhoods, Improving Alternatives to Car Use, New Rail Infrastructure, New Buildings and Flooding are all likely to have significant positive effects.</p> <p>The majority of the strategic sites show uncertain impacts for climate change, due to lack of detailed information in current proposals. Kensal is expected to have a significant positive impact and Wornington Green a positive impact on climate change.</p>
	Flood risk	<p>Policies grouped under Keeping Life Local, Fostering Vitality, Better Travel Choices and Diversity of Housing are unlikely to have any effect on flood risk in the Borough. Policies grouped under An Engaging Public Realm and Renewing the Legacy are likely to have marginal positive impact. The policies grouped under the Respecting Environmental Limits are likely to have greater positive impact, however, the effect of its Biodiversity policy is unclear.</p> <p>Four out of the seven strategic sites show uncertain impacts for flood risk as they contain either a high risk of surface or sewerage flood risk and will require mitigation.</p>
	Air quality	<p>The majority of the policies are likely to have a positive impact on this SA objective, in particular, policies grouped under Keeping Life Local and Better Travel Choices due to their focus on improved public transport, walking and cycling. Policies grouped under Renewing the Legacy and Diversity of Housing are likely to have negligible effect on air quality in the Borough.</p> <p>The majority of the strategic sites show uncertain impacts for air quality, due to lack of detailed information in current proposals.</p>
	Parks & open	<p>The Core Strategy is likely to have an overall positive effect on parks and open spaces in the Borough. The New Town Centres and</p>

SA Objectives		Cumulative effect
	spaces	<p>Successful Town Centres policies under Fostering Vitality are the only policies to which the effect on parks and opens spaces is uncertain. This is due to the strategic nature of the policies and lack of detail of parks and open space management within the individual policies.</p> <p>Overall the strategic sites show a mixture of negligible, positive and uncertain impacts for open spaces. Further details of development are likely to clarify the impact on open spaces.</p>
	Pollution	<p>The majority of Development Management Policies will have either negligible or positive effects on pollution in the Borough. Policies grouped under Keeping Life Local, Fostering Vitality, Better Travel Choices and An Engaging Public Realm are all likely to deliver positive benefits. The effects of two policies under Respecting Environmental Limits on pollution in the Borough are unlikely to affect the outcome of the appraisal which is predicted to be cumulatively positive.</p> <p>The majority of the strategic sites show uncertain impacts for pollution, due to lack of detailed information in current proposals.</p>
	Previously developed land	<p>There is a degree of uncertainty within each Strategic Objective (except for An Engaging Public Realm) on the effect of some policies on this SA objective. Although there are likely to be positive outcomes across many of the Strategic Objectives, the number of uncertainties outnumbers the positives. Without further detail, it is not possible to identify whether the cumulative impact of the policies would result in a positive or negative outcome for this SA objective.</p> <p>Overall the strategic sites show positive impacts for previously developed land.</p>
	Transport	<p>The majority of the Development Management Policies are likely to have negligible or positive impact on the transport objective. In particular, policies grouped under Keeping Life Local, Better Travel Choices and Respecting Environmental Limits are all likely to result in positive outcomes. There are some uncertainties highlighted in policies grouped under Fostering Vitality and A Quality Public Realm and as such, it is not possible to say whether the cumulative impact would be positive or negative.</p> <p>The majority of the strategic sites show uncertain impacts for transport, due to lack of detailed information in current proposals.</p>
	Waste	<p>Only policies grouped under the Renewing the Legacy and Respecting Environmental Limits Objectives are likely to have an effect on this SA objective. Two of the polices under Respecting Environmental Limits are likely to result in a positive effect on this SA objective, however, there is uncertainty over the outcome of the Alterations and Additions policy under Renewing the Legacy. Without further information to the detail of policies it is not possible to determine their overall likely cumulative impact.</p> <p>The majority of the strategic sites show uncertain impacts for waste, due to lack of detailed information in current proposals.</p>
	Energy	<p>Policies grouped under Keeping Life Local, Fostering Vitality, Better</p>

SA Objectives		Cumulative effect
	efficiency	<p>Travel Choices and An Engaging Public Realm are all unlikely to have an effect on energy efficiency in the Borough. Although there are two policies which are likely to resulting in a positive outcome for this SA objective there are a number of uncertainties across the policies grouped under Renewing the Legacy, Diversity of Housing and Respecting Environmental Limits and hence the cumulative effect of the policies is difficult to determine without further detail.</p> <p>The majority of the strategic sites show positive impacts for energy efficiency.</p>
	Cultural heritage	<p>The impact of the Core Strategy on cultural heritage in the Borough is likely to be largely positive across the majority of policies grouped under Strategic Objectives. Some uncertainty as to the effects on cultural heritage of three Development Management Policies within Fostering Vitality should be balanced against the strong positive performance of polices grouped under An Engaging Public Realm and Renewing the Legacy.</p> <p>Overall the strategic sites show negligible impacts for cultural heritage, however detailed design considerations may create positive impacts.</p>
Social	Crime	<p>The majority of the effects of the Development Management Policies are either negligible or positive. There is some uncertainty as to the effect of one policy within An Engaging Public Realm, Diversity of Housing and Respecting Environmental Limits, however, at this stage it is not possible to determine their likely cumulative impact without further detail.</p> <p>Overall the strategic sites show uncertain impacts for crime, however consideration of crime in detailed design considerations may create positive impacts.</p>
	Equalities	<p>The Core Strategy is likely to have an overall cumulative positive effect on equalities in the Borough.</p> <p>Overall the strategic sites show positive impacts for equalities.</p>
	Community facilities	<p>Policies grouped under Keeping Life Local, Fostering Vitality, and Diversity of Housing are all likely to result in a positive effect on community facilities within the Borough. Policies grouped under Better Travel Choices, An Engaging Public Realm and Respecting Environmental Limits are likely to have negligible effect and policies grouped under Renewing the Legacy could have either a positive or negative effect but this is dependent upon further detailed information. Overall, it is likely that the cumulative outcome of the objectives would be positive.</p> <p>The majority of the strategic sites show positive impacts for community facilities.</p>
	Housing	<p>There is a degree of uncertainty and/or the potential for a negative effect on this SA objective from the majority of policies. Although it is likely that policies grouped under Diversity of Housing would be positive, when assessed against policies grouped under other objectives that have greater uncertainty, the cumulative impact could</p>

SA Objectives		Cumulative effect
		<p>result in either positive or negative effects, and would be dependent upon further detail.</p> <p>The majority of the strategic sites show positive impacts for housing.</p>
	Health	<p>Policies grouped under five of the seven Strategic Objectives are likely to have a negligible effect on health provision within the Borough. Policies grouped under Keeping Life Local and Fostering Vitality are likely to have some positive effects however, there is some uncertainty as to the effect of one Keeping Life Local policy. The cumulative impact of the policies grouped under other objectives is likely to be either positive or negligible.</p> <p>Overall the strategic sites show a mixture of negligible, positive and uncertain impacts for health. Further details of development are likely to clarify the impact on health.</p>
Economy	Economic Growth	<p>Policies grouped under four of the seven Strategic Objectives are likely to have a negligible effect on economic growth in the Borough. Of the policies grouped under the remaining three objectives, An Engaging Public Realm is likely to have a positive impact, Fostering Vitality could also have an overall positive impact even though one policy has been identified as potentially resulting in a negative effect and another policy's outcome is uncertain. Policies grouped under Keeping Life Local is likely to result in a positive effect on the economic growth in the Borough, however, there is some uncertainty as to the effect of one of the policies. It is likely that the cumulative effect of the policies on economic growth is positive.</p> <p>The majority of the strategic sites show positive impacts for economic growth.</p>

6.2 Mitigation and Monitoring

6.2.1 **Table 18** summarises out the recommendations alongside suggestions for monitoring. It will be up to the Council to consider the practicalities of monitoring and what might be achievable.

Table 18: Monitoring suggestions

Significant effect	Monitoring suggestion
<ul style="list-style-type: none"> Uncertainty exists for the impact of the Core Strategy on biodiversity. This is significant as the Sustainability Appraisal Update Report identified some baseline indicators for biodiversity had worsened. 	<ul style="list-style-type: none"> It will be critical to monitor the plan against biodiversity indicators to ensure that further species populations in the Borough do not continue to fall in numbers. Suggest using the relevant indicators as set out for the Core Strategy in the Monitoring section for Respecting Environmental Limits.

<ul style="list-style-type: none"> • Uncertainty exists for the impact of the Core Strategy on crime. This is significant as the Sustainability Appraisal Update Report identified some baseline indicators for crime had worsened. 	<ul style="list-style-type: none"> • There would be merit in monitoring 'designing out crime' being used in new development or public realm improvements.
<ul style="list-style-type: none"> • Uncertainty exists for the impact of the Core Strategy housing. This is significant as the Sustainability Appraisal Update Report identified some baseline indicators for housing which had worsened. 	<ul style="list-style-type: none"> • It will be important to monitor supply and demand for housing and conditions within the housing market in the Borough. Suggest using the relevant indicators as set out for the Core Strategy in the Monitoring section for A Diversity of Housing.
<ul style="list-style-type: none"> • There is a relatively high degree of uncertainty regarding the effect of the Core Strategy on the prioritising previously developed land. 	<ul style="list-style-type: none"> • It is important to ensure that development on previously developed land is prioritised. Suggest using the relevant indicators as set out for the Core Strategy in the Monitoring section for A Diversity of Housing.
<ul style="list-style-type: none"> • There is some uncertainty surrounding how the Core Strategy policies grouped under the Fostering Vitality will impact on parks and open spaces. 	<ul style="list-style-type: none"> • It will be useful to determine the plan's impact on parks and open spaces due to their scarcity. Suggest using a relevant indicator for the amount of completed new open space created as set out for the Core Strategy in the Monitoring section for An Engaging Public Realm.
<ul style="list-style-type: none"> • There is a need to monitor flood risk closely. 	<ul style="list-style-type: none"> • It is important to make use of the SFRA and work the Council has undertaken on applying the sequential test to strategic development sites. This approach should also be taken to development expected in the Borough's Places. There may also be some benefit to recording the mitigation measures that have been put in place, so that their effectiveness (in terms of wider sustainability objectives as well as flood risk reduction) can be monitored.
<ul style="list-style-type: none"> • A key effect of the plan will be to stimulate further socio-economic regeneration in North Kensington. 	<ul style="list-style-type: none"> • It will be important that economic, employment and deprivational indicators are closely monitored in North Kensington including key locations like Kensal.

6.3 Conclusions

- 6.3.1 This Core Strategy has set out an approach to growth consistent with requirements of the London Plan of 3,500 net additional units (350 units per annum) to be provided between 2007/8 and 2022/23. The figure reflects the 2004 housing capacity study, supply of housing in the Borough based on a review of large sites and assumptions about small sites and assumption that over one third of the target is expected to be met by vacant dwellings being brought back into use. There are well judged plans for places and strategic sites in the Borough including a major regeneration development at Kensal which aims to address the significant deprivational issues in North Kensington. However, there are a number of uncertainties regarding the future transport plans within the Borough and the associated dependency of some strategic growth sites, including Kensal on these transport plans. The Core Strategy has had to take account of environmental constraints, such as the lack of land for development and scarcity of open space. The Core Strategy has chosen to, in most cases, redevelop existing land that either requires regeneration or redevelopment in order to meet current standards or extend to more environmentally sustainable development and revitalise areas to ensure that they are locally distinctive and harmonious. To further ensure effective environmental protection, and in some cases enhancement, the strategic sites and development management policies include a range of appropriate guidance or criteria to guide development; and more generally, it is thought that the non-spatial 'thematic' policies in the Core Strategy relating to the environment will also be effective. In terms of climate change it is noted that there are fairly strong requirements for sustainable design and construction. Another key effect of the plan is to maintain and promote the Borough as a business and retail centre to maintain and promote economic growth whilst maintaining the cultural heritage for which the borough is world renowned and the Core Strategy in its policies also addresses this.

7 Next Steps

7.1 Consultation

- 7.1.1 To enable the community and other stakeholders to continue to contribute to the LDF, there is now a period of formal consultation on the Pre-submission Core Strategy with a focus on North Kensington. This SA Report will be available for consultation alongside the Core Strategy, to facilitate more informed consultation responses.
- 7.1.2 Following the consultation, the consultation responses as well as the findings of the SA will be further taken into account by the Council. The Core Strategy will be drafted in its final form and submitted to Government. There will then be further consultation, before an independent examination by a planning inspector of the submitted document.
- 7.1.3 Should the plan undergo any further significant change in the future, including as a result of taking onboard consultation responses, the significant changes will also be submitted for further SA.

7.2 SEA Statement

- 7.2.1 Once a plan or programme has been adopted, the SEA Directive requires those responsible for preparing it – in this case the Council - to provide the public and the Consultation Bodies with information on how environmental considerations and consultation responses are reflected in the plan or programme and how its implementation will be monitored in the future. The Directive states that:

Plan or programme proponents should ensure that, when a plan or programme is adopted, the Environmental Consultation Bodies and the public “are informed and the following items are made available to those so informed:

- (a) the plan or programme as adopted;
- (b) a statement summarising how environmental considerations have been integrated into the plan or programme...[including] the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with, and
- (c) the measures decided concerning monitoring [of the plan]

(Annex 9(1))

- 7.2.2 In light of this requirement, the Council will prepare an SEA / SA Statement setting out the above information (reporting on how sustainability considerations have been taken into account rather than environmental considerations only).

Appendix 1 – SEA Checklist

Quality assurance is an important element of the appraisal exercise. It helps to ensure that the requirements of the SEA Directive are met, and show how effectively the appraisal has integrated sustainability considerations into the plan-making process.

Guidance checklist	Chapter	Carried out by
<ul style="list-style-type: none"> The plan's purpose and objectives are made clear. 	3	Scott Wilson
<ul style="list-style-type: none"> Sustainability issues, including international and EC objectives, are considered in developing objectives and targets. 	2	Scott Wilson
<ul style="list-style-type: none"> SA objectives are clearly set out and linked to indicators and targets where appropriate. 	2	Scott Wilson
<ul style="list-style-type: none"> Links with other related plans, programmes and policies are identified and explained. 	2	Scott Wilson
<ul style="list-style-type: none"> Conflicts that exist between SA objectives, between SA and plan objectives, and between SA and other plan objectives are identified and described. 	N/A	
<ul style="list-style-type: none"> The environmental consultation bodies are consulted in appropriate ways and at appropriate times on the content and scope of the SA Report. 	Scoping Report and SA Update Report	Royal Borough of Kensington and Chelsea
<ul style="list-style-type: none"> The appraisal focuses on significant issues. 	Scoping Report, SA Update Report and 2	Scott Wilson
<ul style="list-style-type: none"> Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit. 	Scoping Report, SA Update Report and 4	Scott Wilson
<ul style="list-style-type: none"> Reasons are given for eliminating issues from further consideration. 	Scoping Report and SA Update Report	Scott Wilson
<ul style="list-style-type: none"> Realistic alternatives are considered for key issues, and the reasons for choosing them are documented. 	Plan Documents and 3 and 5	Scott Wilson
<ul style="list-style-type: none"> Alternatives include 'do nothing' and/or 'business as usual' scenarios wherever relevant 	2	Scott Wilson
<ul style="list-style-type: none"> The sustainability effects (both adverse and beneficial) of each alternative are identified and compared 	5 and 6	Scott Wilson
<ul style="list-style-type: none"> Inconsistencies between the alternatives and other relevant plans, programmes or policies are identified 	5 and 6	Scott Wilson

and explained.		
<ul style="list-style-type: none"> Reasons are given for selection or elimination of alternatives. 	Plan Documents and 3 and 5	Scott Wilson
<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and their likely evolution without the plan are described. 	2	Scott Wilson
<ul style="list-style-type: none"> Characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan where practicable. 	2	Scott Wilson
<ul style="list-style-type: none"> Difficulties such as deficiencies in information or methods are explained. 	Scoping Report and SA Update Report	Scott Wilson
<ul style="list-style-type: none"> Likely significant social, environmental and economic effects are identified, including those listed in the SEA Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape), as relevant. 	5 and 6	Scott Wilson
<ul style="list-style-type: none"> Both positive and negative effects are considered, and where practicable, the duration of effects (short, medium or long-term) is addressed. 	5 and 6	Scott Wilson
<ul style="list-style-type: none"> Likely secondary, cumulative and synergistic effects are identified where practicable. 	5 and 6	Scott Wilson
<ul style="list-style-type: none"> Inter-relationships between effects are considered where practicable. 	5 and 6	Scott Wilson
<ul style="list-style-type: none"> Where relevant, the prediction and evaluation of effects makes use of accepted standards, regulations, and thresholds. 	5 and 6	Scott Wilson
<ul style="list-style-type: none"> Methods used to evaluate the effects are described. 	4	Scott Wilson
<ul style="list-style-type: none"> Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan are indicated. 	5 and 6	Scott Wilson
<ul style="list-style-type: none"> Issues to be taken into account in development consents are identified. 	N/A	
<ul style="list-style-type: none"> Is clear and concise in its layout and presentation. 	All	Scott Wilson
<ul style="list-style-type: none"> Uses simple, clear language and avoids or explains technical terms. 	Non-technical Summary	Scott Wilson
<ul style="list-style-type: none"> Uses maps and other illustrations where appropriate. 	All	Scott Wilson
<ul style="list-style-type: none"> Explains the methodology used. 	All	Scott Wilson
<ul style="list-style-type: none"> Explains who was consulted and what methods of consultation were used. 	Scoping Report and 7	Scott Wilson

<ul style="list-style-type: none"> Identifies sources of information, including expert judgement and matters of opinion. 	Scoping Report and 2	Scott Wilson
<ul style="list-style-type: none"> Contains a non-technical summary. 	Yes	Scott Wilson
Consultation		
<ul style="list-style-type: none"> The SA is consulted on as an integral part of the plan-making process. 	Yes, see 1 and 7	Scott Wilson
<ul style="list-style-type: none"> The consultation bodies, other consultees and the public are consulted in ways which give them an early and effective opportunity within appropriate time frames to express their opinions on the draft plan and SA Report. 	Yes	Royal Borough of Kensington and Chelsea
<ul style="list-style-type: none"> The SA Report and the opinions of those consulted are taken into account in finalising and adopting the plan. 	Forthcoming	
<ul style="list-style-type: none"> An explanation is given of how they have been taken into account. 	Forthcoming	
<ul style="list-style-type: none"> Reasons are given for choices in the adopted plan, in the light of other reasonable options considered. 	Forthcoming	
<ul style="list-style-type: none"> Measures proposed for monitoring are clear, practicable and linked to the indicators and objectives used in the SA. 	Section 6	Scott Wilson
<ul style="list-style-type: none"> Monitoring is used, where appropriate, during implementation of the plan to make good deficiencies in baseline information in the SA. 	Forthcoming	
<ul style="list-style-type: none"> Monitoring enables unforeseen adverse effects to be identified at an early stage (These effects may include predictions which prove to be incorrect.) 	Forthcoming	
<ul style="list-style-type: none"> Proposals are made for action in response to significant adverse effects. 	Forthcoming	

Appendix 2 – Strategic Sites Appraisal

Strategic Site: Kensal Gasworks (sites north and south of the railway)

	SA Objectives	Score	Comments	Recommendations
Environment	1. To conserve and enhance the natural environment and biodiversity	?	<p>The aim to deliver an 'exemplary environmentally responsive mixed use development' should ensure a positive outcome for SA Objectives 5, 11, and 14. In particular, if an environmentally responsive medium rise high density development of no less than 2000 dwellings in close proximity to good public transport is brought forward, then this should ensure a significantly positive outcome for SA Objective 5.</p> <p>The potential to provide on-site waste management facilities could enable a positive outcome for SA Objective 11 and SA Objective 14 is also likely to be positive with the reuse of the on-site Sainsbury's and implementation of good building design.</p> <p>The availability of previously developed land on-site should ensure that the proposal performs well against SA Objective 9a, however, the impact of the development on the Grade I and Grade II sites of Borough importance within the site boundary is unknown at this stage and hence the outcome on SA Objective 1 is uncertain. Recommendation – include these within constraints section.</p> <p>The focus on improved public realm around the canal side should ensure that the proposal performs well against SA Objectives 1 and 8, however, at this stage no details are available to confirm this. It is recommended that the green corridors identified on the environmental constraints map should be preserved and/or enhanced and also highlighted in the constraints section of the site plan.</p> <p>The decommissioning of the gas holders and land decontamination should improve the environmental quality of the area, when undertaken, and hence, enable a positive outcome for SA objective 9.</p> <p>The site is poorly connected to existing public transport infrastructure, particularly at the western</p>	Recommendation – include Grade I and II sites of Borough Importance in the constraints section.
	5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables and adopt measures to adapt to climate change	++		The green corridors identified on the environmental constraints map should be preserved and/or enhanced and also highlighted in the constraints section of the site plan.
	6. Reduce the risk of flooding to current and future residents	0		
	7. Improve air quality in the Royal Borough	?		
	8. Protect and enhance the Royal Borough's parks and open spaces	?		
	9. Reduce pollution of air, water and land	+		
	9a. 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. Reduce the amount of waste produced and maximise the amount of waste that is recycled	+		
	14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials	+		
	16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage	0		

			end of the site and the successful delivery of no less than 2000 new dwellings is dependent on the provision of a Crossrail station. A Crossrail station or other improved public transport providing realistic alternative sustainable transport choices should help achieve positive outcomes to SA Objectives 10. Improved accessibility northwards to Kensal Green and south across the mainline railway would also help achieve this Objective.	
Community	2. Reduce crime and anti-social behaviour and the fear of crime	+	The site's surrounds contain high levels of employment, income and housing deprivation and this is reflected in the understanding that the Gasworks holds the key to significant regeneration in North Kensington. The provision of social and community uses at the site and improvement to the quality of the public realm, as well as the identified s106 requirements for affordable housing contribution (if not provided as part of the development) should help deliver a positive response to the Social SA Objectives, particularly SA Objectives 12 and 13. An improved public realm, with increased permeability both north and south of the site combined with likely increased footfall should help achieve a positive outcome for SA Objective 2. Uncertainty over the extent of social and community infrastructure and provision of accessible health care meant that the outcome for SA Objectives 4 & 15 was largely unknown.	
	4. Encourage social inclusion (including access), equity, the promotion of equality and a respect for diversity	?		
	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	++		
	13. To aim that the housing needs of the Royal Borough's residents are met	+		
	15. Ensure the provision of accessible health care for all Borough residents	?		

Economy	3. To support a diverse and vibrant local economy to foster sustainable economic growth	+	Any provision of additional retail and business space would help improve the diversity and vibrancy of the local economy. This would be further enhanced by the provision of improved transport infrastructure enabling greater accessibility to the site.	
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Key	Likely effect on the SA Objective
++	Significant positive benefit
+	Some positive benefit
0	No significant effect
X	Some adverse impact
XX	Significant adverse impact
?	Uncertain or insufficient information on which to determine

Strategic Site: Worrington Green

	SA Objective	Score	Comment	Recommendations
Environment	1. To conserve and enhance the natural environment and biodiversity	+	Overall, the proposed redevelopment at Worrington Green should deliver positive environmental improvements to the site, particularly if the site-specific s106 agreements to, among others, reinstate an improved Athlone Gardens and improve walking and cycling accessibility are delivered. The identified need for a site management plan should ensure protection of the tree preservation orders in the north west of the site; and the re-provision of and equal if not larger new park should enable a positive outcome for SA Objective 1 and 8. A commitment to undertake redevelopment as quickly as possible and maintain good quality open space throughout the construction period, in addition to a construction traffic management plan should also help maintain good local environmental quality. The extent to which effects on climate change would be reduced are dependent on detailed design, however, improvements to Decent Homes Standards should deliver positive benefits against SA Objective 5 and 14. Identified s106 requirement on permit free parking may encourage greater car ownership, and hence, there is uncertainty as the outcome of SA Objective 10. Uncertain effects also identified for SA Objective 6 as the sequential test has identified high risk of surface water flooding that will require mitigation.	The flood risk of the site should be identified as a constraint.
	5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables and adopt measures to adapt to climate change	+		
	6. Reduce the risk of flooding to current and future residents	?		
	7. Improve air quality in the Royal Borough	0		
	8. Protect and enhance the Royal Borough's parks and open spaces	+		
	9. Reduce pollution of air, water and land	0		
	9a. 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. Reduce the amount of waste produced and maximise the amount of waste that is recycled	0		
	14. Encourage energy efficiency through building design; maximise the re-use of buildings and the recycling of building materials	+		
16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage	0			

Social	2. Reduce crime and anti-social behaviour and the fear of crime	+	<p>This site and its surrounds is within the top 10% of employment, income, housing and crime deprivation and multiple deprivation nationally. Hence, the proposed redevelopment, with provision of leisure and community facilities and tertiary education facilities could help address these issues.</p> <p>The specific redevelopment priority to keep the community together, as well as, the identified s106 requirements and proposals for improved social and community infrastructure should help facilitate greater social inclusion and community cohesion and result in positive outcomes for SA Objectives 4 and 12. Improvements in the building fabric to Decent Homes Standards and additional housing provision (both private and affordable) should assist the Royal Borough in meeting its housing need and the needs of residents and result in a positive outcome for SA Objective 13.</p> <p>The provision of a Safer Neighbourhood Police Base in the area should help reduce crime and the fear of crime and hence lead to a positive outcome for SA Objective 2.</p>
	4. Encourage social inclusion (including access), equity, the promotion of equality and a respect for diversity	+	
	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	+	
	13. To aim that the housing needs of the Royal Borough's residents are met	+	
	15. Ensure the provision of accessible health care for all Borough residents	+	
Economy	3. To support a diverse and vibrant local economy to foster sustainable economic growth	+	<p>The proposed leisure and community facilities and the identified s106 construction training contribution should provide some stimulus to the local economy and result in a positive response to SA Objective 3.</p>

Key	Likely effect on the SA Objective
++	Significant positive benefit
+	Some positive benefit
0	No significant effect
X	Some adverse impact
XX	Significant adverse impact
?	Uncertain or insufficient information on which to determine

Strategic Site: Land adjacent to Trellick Tower

	SA Objective	Score	Comment	Recommendations
Environment	1. To conserve and enhance the natural environment and biodiversity	?	The development of this site contains little information to appraise its impact on many of the environmental SA objectives, apart from a significant positive outcome for SA objective 9a and positive outcome for SA objective 14. There are no identified environmental constraints on the site, although there are Grade II* listed buildings adjoining the north and west sides of the site and a site of local importance for nature conservation adjoining the north of the site.	Recommendation: These constraints should be considered in any design of the new development.
	5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables and adopt measures to adapt to climate change	?		
	6. Reduce the risk of flooding to current and future residents	0		
	7. Improve air quality in the Royal Borough	?		
	8. Protect and enhance the Royal Borough's parks and open spaces	0		
	9. Reduce pollution of air, water and land	?		
	9a. 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. Reduce the amount of waste produced and maximise the amount of waste that is recycled	?		
	14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials	+		
	16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage	?		

Social	2. Reduce crime and anti-social behaviour and the fear of crime	?	The delivery of a minimum of 60 residential units to fund regeneration including improvements to social and community facilities is likely to bring positive outcomes for SA Objectives 4, 12, 13 and 15, however, a lack of detailed information means that an effective appraisal was difficult. The development site is within the top 10% in terms of crime, housing, income deprivation and multiple deprivation and therefore, positive redevelopment at the site should have beneficial improvements to the local community.	Recommendation: that the design of the development considers community safety.
	4. Encourage social inclusion (including access), equity, the promotion of equality and a respect for diversity	?		
	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	+		
	13. To aim that the housing needs of the Royal Borough's residents are met	+		
	15. Ensure the provision of accessible health care for all Borough residents	?		
Economy	3. To support a diverse and vibrant local economy to foster sustainable economic growth	+	The proposal to accommodate studio workspace units should help increase economic growth in the immediate area. The extent to whether it diversifies the local economy would be dependent upon the nature of businesses take-up.	

Key	Likely effect on the SA Objective
++	Significant positive benefit
+	Some positive benefit
0	No significant effect
X	Some adverse impact
XX	Significant adverse impact
?	Uncertain or insufficient information on which to determine

Strategic Site: North Kensington Sports Centre

	SA Objective	Score	Comment	Recommendations
Environment	1. To conserve and enhance the natural environment and biodiversity	?	The proposed allocation of development on the site is devoid of all references to environmental constraints. The proposed development is likely to include development on previously developed land, however, the extent of development on the existing open space is unclear. No details are provided about management of the Grade II listed building to the north of the site. The site has relatively poor transport accessibility, particularly with regards to the existing road network. An improved street network and better permeability would be required if a new secondary school were to be provided on the site, however, depending on the delivery of the identified s106 contributions towards improving public transport access and traffic management plans, there could be a perverse trend towards greater personal car use in the area. It is not clear as to the likely sustainability credentials of the proposed new infrastructure. The site is of high risk to surface water and sewerage flooding as determined by the sequential test and will require mitigation.	The flood risk of the site should be identified as a constraint.
	5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables and adopt measures to adapt to climate change	?		
	6. Reduce the risk of flooding to current and future residents	?		
	7. Improve air quality in the Royal Borough	?		
	8. Protect and enhance the Royal Borough's parks and open spaces	?		
	9. Reduce pollution of air, water and land	?		
	9a. 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. Reduce the amount of waste produced and maximise the amount of waste that is recycled	0		
	14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials	?		
	16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage	0		

Social	2. Reduce crime and anti-social behaviour and the fear of crime	+	The proposed site development has a strong positive social element including a new secondary school with sports facilities and re-provision of the existing sports facilities that should result in positive outcomes for all the Social SA Objectives, in particular, through the identified s106 requirements to provide dual use sports facilities and contributions towards social and health infrastructure. The site surrounds are in the top 10% nationally of crime, housing, and multiple deprivation and positive development in the area should help improve housing availability and potentially reduce crime and fear of crime through greater footfall and improved street network permeability.
	4. Encourage social inclusion (including access), equity, the promotion of equality and a respect for diversity	+	
	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	++	
	13. To aim that the housing needs of the Royal Borough's residents are met	+	
	15. Ensure the provision of accessible health care for all Borough residents	+	
Economy	3. To support a diverse and vibrant local economy to foster sustainable economic growth	0	No effects identified.

Key	Likely effect on the SA Objective
++	Significant positive benefit
+	Some positive benefit
0	No significant effect
X	Some adverse impact
XX	Significant adverse impact
?	Uncertain or insufficient information on which to determine

Strategic Site: The Former Commonwealth Institute

	SA Objective	Score	Comment	Recommendations
Environment	1. To conserve and enhance the natural environment and biodiversity	?	Reuse and enhancement of the existing building with the aim to develop it into a high trip generating arts and cultural use should result in positive outcome for SA Objectives 9a, 14 and 16. The degree of positive performance will be dependent upon the detailed project plans. There is uncertainty regarding the impact of the proposed development on local biodiversity and the natural environment, however, the identified constraints of the site should ensure any development is delivered in the context of full local environmental understanding. The extent to which the project will contribute to reducing effects on climate change, reduce pollutants and reduce waste is unknown, however, efforts should be made to discourage visitors travelling to the Institute by car.	
	5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables and adopt measures to adapt to climate change	?		
	6. Reduce the risk of flooding to current and future residents	0		
	7. Improve air quality in the Royal Borough	?		
	8. Protect and enhance the Royal Borough's parks and open spaces	0		
	9. Reduce pollution of air, water and land	?		
	9a. 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. Reduce the amount of waste produced and maximise the amount of waste that is recycled	?		
	14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials	+		
	16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage	+		

Social	2. Reduce crime and anti-social behaviour and the fear of crime	?	The project should help contribute to positive improvements on SA Objectives 4 and 12 given that the facilities are open and accessible to all. Impacts of the development on local crime levels is uncertain.	Recommendation: that the design of the development considers community safety.
	4. Encourage social inclusion (including access), equity, the promotion of equality and a respect for diversity	+		
	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	+		
	13. To aim that the housing needs of the Royal Borough's residents are met	0		
	15. Ensure the provision of accessible health care for all Borough residents	0		
Economy	3. To support a diverse and vibrant local economy to foster sustainable economic growth	+	The site proposal should have positive impacts on employment and the local economy, however, the extent to these impacts is uncertain at this stage.	

Key	Likely effect on the SA Objective
++	Significant positive benefit
+	Some positive benefit
0	No significant effect
X	Some adverse impact
XX	Significant adverse impact
?	Uncertain or insufficient information on which to determine

Strategic Site: Warwick Road

	SA Objective	Score	Comment	Recommendations
Environment	1. To conserve and enhance the natural environment and biodiversity	?	The five sites including 100 West Cromwell Road propose a variety of development including residential, commercial, community and social and open amenity space provision. The precise nature and balance of this delivery is not clear, however, it is likely that there would be positive effects on SA Objectives 8 and 9a given the identified site specific s106 requirements for public open space and landscaping improvements. The site contains areas of high risk for surface and sewerage water flooding according to the sequential test and will require mitigation. The nature of the developments on the other SA Objectives is unclear without further detailed design data.	The flood risk of the site should be identified as a constraint.
	5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables and adopt measures to adapt to climate change	?		
	6. Reduce the risk of flooding to current and future residents	?		
	7. Improve air quality in the Royal Borough	?		
	8. Protect and enhance the Royal Borough's parks and open spaces	+		
	9. Reduce pollution of air, water and land	0		
	9a. 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. Reduce the amount of waste produced and maximise the amount of waste that is recycled	?		
	14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials	?		
	16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage	?		

Social	2. Reduce crime and anti-social behaviour and the fear of crime	?	The identified site specific s106 requirements focus on the provision of social infrastructure including a primary school, affordable housing and community and social infrastructure amongst others. Based on this, delivery of the development at the Warwick Road sites is likely to have positive effects on SA Objectives 4, 12 and 13. The area experiences high levels of housing deprivation and therefore measures to increase housing delivery in this area are welcomed. The extent to which crime would be reduced or whether additional health care facilities are to be provided is not clear.	Recommendation: that the design of the development considers community safety.
	4. Encourage social inclusion (including access), equity, the promotion of equality and a respect for diversity	+		
	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	+		
	13. To aim that the housing needs of the Royal Borough's residents are met	+		
	15. Ensure the provision of accessible health care for all Borough residents	?		
Economy	3. To support a diverse and vibrant local economy to foster sustainable economic growth	+	The proposed developments should cumulatively deliver a variety of retail, leisure, community and business use facilities which should aid in supporting and developing the local economic base.	

Key	Likely effect on the SA Objective
++	Significant positive benefit
+	Some positive benefit
0	No significant effect
X	Some adverse impact
XX	Significant adverse impact
?	Uncertain or insufficient information on which to determine

Strategic Site: Earl's Court

	SA Objective	Score	Comment	Recommendations
Environment	1. To conserve and enhance the natural environment and biodiversity	?	There is very little information regarding the environmental elements of the proposed development other than the appreciation that the site will be developed on previously developed land. The continued use as an exhibition centre as well as provision of office space and residential units has identified the opportunity for establishing a district heating scheme which could help minimise the proposed development's impacts on climate change. A Grade I Borough site of Nature Conservation Importance is identified at the south west of the site and therefore development around this site should be carefully managed and should be identified as a constraint. The whole site and its surrounds is identified as 'open space deficient'. The identified s106 requirement to help 'unravel' the Earl's Court One Way System should help improve local environmental quality and potentially reduce local air pollution. The site contains a high risk of surface water and sewerage flood risk as identified in the sequential test and will require mitigation.	Recommendation: should identify the Grade I Borough site of Nature Conservation Importance site as a constraint and also should consider ways to create biodiversity – green roofs within the development. Open space of some form should also be considered, especially for the residential component. The flood risk of the site should be identified as a constraint.
	5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables and adopt measures to adapt to climate change	?		
	6. Reduce the risk of flooding to current and future residents	?		
	7. Improve air quality in the Royal Borough	?		
	8. Protect and enhance the Royal Borough's parks and open spaces	0		
	9. Reduce pollution of air, water and land	?		
	9a. 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. Reduce the amount of waste produced and maximise the amount of waste that is recycled	?		
	14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials	?		
	16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage	0		

Social	2. Reduce crime and anti-social behaviour and the fear of crime	?	Continued use of Earl's Court as an exhibition centre should enable a positive effect on SA Objective 4 if accessible to all members of society. Delivery of residential units would help in meeting the housing needs of the Borough's residents in an area in the top 10% most deprived in terms of housing deprivation. This should be further improved if the identified s106 requirement for affordable housing is agreed. It is unlikely that the development would have any effect on SA Objectives 12 or 15. The extent to which crime would be reduced is not clear.	Recommendation: that the design of the development considers community safety.
	4. Encourage social inclusion (including access), equity, the promotion of equality and a respect for diversity	+		
	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	0		
	13. To aim that the housing needs of the Royal Borough's residents are met	+		
	15. Ensure the provision of accessible health care for all Borough residents	0		
Economy	3. To support a diverse and vibrant local economy to foster sustainable economic growth	+	The proposed development should help support the local economy, in particular if the potential for office space provision is realised. Just to the south of the site lies an area in the top 10% most deprived in terms of employment and any additional job creation in the area should help improve this situation.	

Key	Likely effect on the SA Objective
++	Significant positive benefit
+	Some positive benefit
0	No significant effect
X	Some adverse impact
XX	Significant adverse impact
?	Uncertain or insufficient information on which to determine