

Comment

Consultee	Mr T Nodder (188572)
Email Address	chairman@oakleystreet.org.uk
Company / Organisation	K&C Environment Round Table
Address	83 Oakley Street London SW3 5NP
Event Name	Proposed Submission Core Strategy
Comment by	K&C Environment Round Table (Mr T Nodder)
Comment ID	PSubCS21
Response Date	10/12/09 11:55
Consultation Point	Policy CH 1 Housing Targets (View)
Status	Processed
Submission Type	Web
Version	0.4

Do you consider this part of the core strategy to be Legally compliant?

Do you consider this part of the core strategy to be Sound? . No

Do you consider this part of the core strategy to be unsound because it is not: . Effective

You have selected NO

Please give details of why you consider this part of the core strategy to be unsound or not legally compliant. Please be as precise as possible when setting out your comments.

Making provision for the numbers of additional dwellings proposed in Policy CH1 will require a positive parallel provision of services, schools, community resources, neighbourhood retail facilities, transport improvements and green spaces. This is acknowledged in para 35.3.3. However, Para 39.1.9 recognises that there is a risk that infrastructure may not be provided. It is noted that in the Infrastructure Chapter and tables many items depend on sources of funding from private finance, developer contributions and S106 contributions. We note that the "Green" items are mostly so dependent. We doubt whether in this respect the Core Strategy meets sufficiently the expectation of PPS12 quoted in 37.2.2. We support generally the comments from the Kensington Society and the Chelsea Society, sharing their concerns that the Borough could become over-developed in an unbalanced way. In particular, we are concerned that the Strategy will not effectively deliver the green improvements that are needed for the environmental health of the Borough.

We also support strongly the comments made by the amenity societies regarding the importance of protecting and enhancing the Thameside.

Officer's response to comments

While the representation does not appear to raise an issue of soundness *per se* it should be noted that Policy C1, and the assessed infrastructure requirements seek to ensure that new developments will assist in providing necessary infrastructure. In preparing an assessment of infrastructure requirements, best practice as provided by PAS has been used, with consultation and involvement of stakeholders. It is an on-going process, and so will evolve over time, while Policy C1 requires necessary infrastructure to be provided alongside development, and complies with Circular 05/2005.

A Planning Obligations Supplementary planning Document has also been prepared to assist in formulating the required obligations to secure infrastructure, including necessary community and green infrastructure.

Combined, and taking account of the best practice, it is considered that the approach to infrastructure delivery meets the test of PPS12. The Borough is also part of a Planning Officer's Society grouping sharing and developing best practice in infrastructure planning, and English Nature have been involved in the process, to the extent of advising on provision of green infrastructure, on an on-going basis. Through the approach adopted, it is considered that the tests of soundness, and the PPS12 requirement, are met.

Officer's Recommendations

No change.

Comment

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Company / Organisation	K&C Environment Round Table
Address	83 Oakley Street London SW3 5NP
Event Name	Proposed Submission Core Strategy
Comment by	K&C Environment Round Table (Mr T Nodder)
Comment ID	PSubCS5
Response Date	09/12/09 17:12
Consultation Point	Policy CE 1 Climate Change (View)
Status	Processed
Submission Type	Web
Version	0.5

Do you consider this part of the core strategy to be Legally compliant?

Do you consider this part of the core strategy to be Sound? . No

Do you consider this part of the core strategy to be unsound because it is not: . Effective

You have selected NO

Please give details of why you consider this part of the core strategy to be unsound or not legally compliant. Please be as precise as possible when setting out your comments.

We consider Chapter 36 Respecting Environmental Limits to be well prepared and to be generally sound in most respects, and we strongly support its inclusion in the Core Strategy. However, we consider that the policies for requiring development to make a significant contribution towards the Government's targets to reduce national carbon dioxide emissions are unsound as not likely to be sufficiently effective. Policy CE1 (b) requires an assessment to demonstrate that conversions and refurbishment achieve relevant standards; in the case of residential development to achieve specific levels of the EcoHomes standards. This is applied to conversions and refurbishment defined as major development. We think that the policy should apply to conversions or refurbishments which produce 5 flats or more rather than 10 flats or more, because it would otherwise be ineffective as it would affect very few developments.

Particular evidence cited in the strategy to justify the Policy as drafted is Residential Evidence Base Report dated 21 October 2009. This Report shows that how three different properties in the Borough could be retrofitted to the EcoHomes standard required. The number of dwelling units and floor areas in each of the properties is not clear, but they would most probably fall below the major development definition. They are nonetheless typical of many properties in the Borough, of the sort that will need to be retrofitted as soon as practicable. Similar houses, containing 5,6, or perhaps 7 apartments are quite frequently being put forward for conversion and refurbishment. The scale of such conversions, and the need to control developments is recognised in the Diversity of Housing Chapter of the Core Strategy, e.g. para 35.3.16. In our view no time should be lost in bringing such developments within the scope of Policy CE 1 (b) (i).

The current London Plan Policy 4B.4 on retrofitting expects Boroughs to support measures to produce a lower environmental impact from the existing stock of buildings by supporting policies and programmes for refurbishment of buildings which will reduce carbon dioxide emissions etc. Para 4.111 states that the retrofitting of the existing building stock could make a significant contribution to achieving the sustainability aims of the Plan.

The Mayor of London's Housing Strategy is to be published soon. The draft (May 2009) at Para 2.2.2 emphasises that the carbon reduction target cannot possibly be met without a major programme of retrofitting the existing housing stock.

In the Mayor of London's proposals for a new London Plan (October 2009), Policy 5.4 on retrofitting expects Boroughs to identify opportunities for reducing carbon dioxide emissions from existing building stock.

We suggest that the threshold for development by conversion or refurbishment to be subject to assessment under Policy CE 1 (b) (i) should be set to cover properties of 5 dwelling units or more. This should provide a satisfactory starting point for developers and the Council to follow through the findings of the Residential Evidence Base Report and obtain appropriate experience before rolling forward the work of retrofitting, as envisaged in Policy CE1 (i).

In addition, we should like to see the further progress under Policy CE 1 (i) given a tighter timetable. The words "in due course" could be replaced by " within two years of the publication of this Core Strategy".

Officer's response to comments

Support noted. Agree with comment. However, the Council has taken a cautious approach, as this policy is new and fairly untested. However, the Council may choose to exercise Policy CE1(i), provides an opportunity to decrease the threshold to which this policy would apply, in accordance with the Evidence by Pittman Tozer.

Officer's Recommendations

No change proposed.