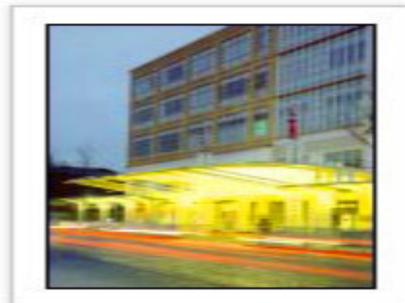


The Royal Borough of Kensington and Chelsea

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# Sustainability Appraisal for the Warwick Road Planning Brief Supplementary Planning Document Sustainability Appraisal Report



Prepared for:



THE ROYAL BOROUGH OF  
KENSINGTON  
AND CHELSEA

## Revision Schedule

### SA of RBKC Warwick Road Planning Brief SPD June 2007

Rev	Date	Details	Prepared by	Reviewed by	Approved by
01	August 2007	SA Report for Consultation	<b>Alex White</b> Senior Consultant	<b>Steve Smith</b> Principal Consultant	<b>Martin Herbert</b> Technical Director
02	September 2007	Final SA Report for Consultation	<b>Alex White</b> Senior Consultant	<b>Steve Smith</b> Principal Consultant	<b>Martin Herbert</b> Technical Director

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## Non-Technical Summary

Four sites in the Royal Borough of Kensington & Chelsea have come forward for redevelopment. These sites are located next to each other on the corner of Warwick Road and Kensington High Street, in the west of the Borough. The sites are Charles House (currently containing offices), a derelict site that used to be a Territorial Army site, a former Telephone Exchange and a Homebase Outlet.

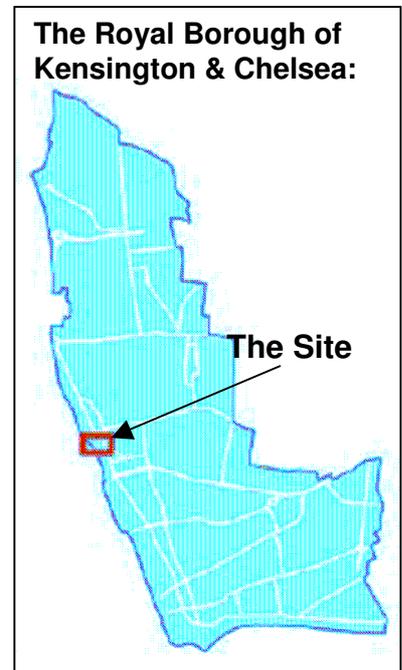
In response to these sites coming forward for redevelopment, the Council have decided that it would be best for the sites to be developed as a coordinated holistic development including appropriate infrastructure. This is to ensure that the needs of the surrounding area and of future residents are met from the development. The preferred use of the site as a whole is for a residential-led development. As a result the Council have put together a document that provides details of their requirements for the development.

This document, the Warwick Road Planning Brief, is a Supplementary Planning Document (SPD) which forms part of the Council's Local Development Framework (LDF). For further information about the Local Development Framework visit:

<http://www.rbkc.gov.uk/Planning/localdevelopmentframework/default.asp>

This SPD has been subject to a Sustainability Appraisal (SA). The SA aims to look at the likely impacts of the development on the environment, community and local economy. The SA did this by comparing the SPD to the sustainability objectives for the Royal Borough. The sustainability objectives for the Borough were defined in the Scoping Report for the SA. For further information on the Scoping Report visit:

[http://www.rbkc.gov.uk/Planning/localdevelopmentframework/ldf\\_page4.asp](http://www.rbkc.gov.uk/Planning/localdevelopmentframework/ldf_page4.asp)



There are a number of issues for the SPD that are examined by the SA. First, the issue of whether or not to adopt the SPD is considered (**Issue 1**). Second, the options for residential-led development on the site versus other uses are addressed (**Issue 2**). Lastly, the likely impacts of the current version of the SPD (**Issue 3**) and of each of the different requirements of the SPD are looked at (**Issue 4**).

The options appraised for each issue were as follows (*Note: the background to these issues and options is provided in Section 4.3 of the main report*):

<b>Issue 1: Adoption of SPD</b>
Option a: Adopt SPD
Option b: Do not adopt SPD
<b>Issue 2: Residential-led development</b>
Option a: Residential led
Option b: Dominance of other uses (not carried forward)
<b>Issue 3: Scope of SPD</b>
Option a: All requirements in current draft (options 4a to 4g)
Option b: Selection of options for requirements
<b>Issue 4: Selection of options</b>
Option a: Affordable housing
Option b: Education facilities
Option c: Health care facilities
Option d: Open Space
Option e: Retail/Commercial units
Option f: Sustainable transport provision
Option g: Sustainable construction and design

This report sets out the findings of the SA and the recommendations for how negative impacts can be reduced and positive impacts enhanced. These findings and recommendations will be used to help inform the development of the SPD. Once the preferred options for the SPD are identified by the Council, these will be subject to a SA and a final SA report produced.

## Outcomes

### Issue 1: Adopting the SPD

The SA concluded that it would be better in terms of sustainability for the SPD to be adopted (**Option B**) rather than not being adopted (**Option A**). This is because without the SPD, it is possible that the separate sites may not develop in a holistic manner as envisioned in the Planning Brief. This could have negative impacts for the local economy and local distinctiveness

and provision of social and community facilities and open space. Implementation of the SPD would lead to all of the sites being developed in a coordinated way which could mean that it will be possible to include energy efficiency, recycling, traffic and flood minimisation measures.

## **Issue 2: Residential-led development**

Providing a residential-led development (**Option A**) on the site will help meet the housing needs of the Borough, particularly through inclusion of affordable housing, and may have positive impacts on the local economy. However, residential-led development may increase waste and traffic generation, energy use and demand for social/community facilities and open space. Nevertheless, the SPD includes a number of measures to mitigate for these impacts which provided fully implemented, should ensure significant adverse effects are avoided. The sites are located in Flood Zone 1 which is the lowest risk flood zone. However, for all sites over 1 hectare (the Charles House and Homebase sites) a Surface Water Flood Risk assessment is required. As part of this assessment, surface water run off should be reduced through good design of the site. The impacts of a dominance of other uses (**Option B**) will depend largely on the type of uses selected.

## **Issue 3: Scope of the SPD**

Implementation of the SPD in its current format, i.e. with all requirements included (**Option A**) should have significant positive effects on housing, provision of open space and community facilities. There are also likely to be positive impacts on the natural environment and the local economy. The potential negative issues of traffic, waste generation, crime and social exclusion are all likely to be mitigated by measures included in the SPD. However, should inclusion of all requirements mean the development is not feasible or viable then it is likely that not all the options included in the SPD will be taken up in a future planning application for one of the sites (**Option B**). The impacts of this option are heavily dependent on which options are included. While Option B allows greater flexibility in order to meet the needs of the local area, this could mean that the development will perform less well for some aspects of sustainability e.g. renewable energy use/sustainable design & construction.

## **Issue 4: Selection of requirements**

Provision of affordable housing with the development (**Option A**) should have positive impacts on housing needs. Provision of education (**Option B**) or health (**Option C**) facilities should have positive impacts on provision of facilities for the community especially as there is a growing need for such facilities in this area of the Borough. Provision of retail/commercial units (**Option E**) should have positive impacts on the local economy. However all of these uses could lead to increased traffic and waste generation. Provision of amenity space (**Option D**) should have significant positive effects on open space provision in the area, which is in particular demand as the site is in an area of Open Space Deficiency. There could also be indirect positive impacts on biodiversity from this option too. Inclusion of sustainable transport measures (**Option F**) should have significant positive effects on traffic, air quality and climate change. Lastly, sustainable construction and design measures (**Option G**) should help increase energy efficiency, climate

change and minimisation of waste. There could also be positive impacts on the natural environment. Significant negative impacts could occur from these options if one is implemented at the expense of the other. For example if retail/commercial facilities are provided in preference to health facilities. This suggests that trade-offs will need to be made. The following section sets out recommendations for how negative impacts from any necessary trade-offs could be minimised. It also sets out areas of the SPD that could be changed to improve their sustainability performance.

### Recommendations:

The following features should be taken into consideration when deciding the requirements that will be included in the final SPD are as follows:

1. The site is in an area of Open space deficiency which would be exacerbated by residential development;
2. There is a large and increasing demand for primary school places in this area of the Borough. Residential development could further raise demand for education facilities;
3. The RBKC PCT have indicated that additional health facilities will be required with new residential development. Without inclusion of health facilities, needs of existing and future residents may not be met;
4. The whole Borough is in an AQMA and Warwick road and Kensington High Street are busy thoroughfares. As a result the area is particularly sensitive to increases in traffic which could lead to increased congestion and deteriorating air quality;
5. For all sites over 1 hectare in Flood Zone 1 a Surface Water Risk Assessment is required by PPS25. As a result, a Flood Risk Assessment will be required for two of the four sites and its findings included into development proposals;
6. Demolition of buildings and operation of the development could give rise to large volumes of waste. Sustainable use of this waste should be considered; and
7. The site is adjacent to the West London and District Lines Site of Nature Conservation Importance (SNCI) which although not a national designation, should be protected and enhanced wherever possible; and
8. Flexibility with requirements of the SPD could ensure that the development meets needs of the local area and future residents but could reduce the performance of the development with respect to overall sustainability for example in terms of energy efficiency.

In addition, there are a few areas that could be amended to help improve the performance of the SPD with respect to sustainability:

9. The SPD could strengthen its position in line with national guidance to include requirements to enhance biodiversity on and around the site. Given the number of trees present there could be potential for breeding birds and bats;

10. The SPD could include reference to the Designing Out Crime SPD to strengthen requirements for high standards of security and crime prevention;
11. Thought should be taken on the provision of office space, as the existing use sets a precedence for this and may need to be replaced;
12. The SPD could reference to the Access Design Guide SPD to help ensure requirements for people with special mobility needs are incorporated into the development;
13. The SPD could require the achievement of a six star rating under the Code for Sustainable Homes. The SPD can be further strengthened by the addition of requirements for reuse of demolition materials;
14. Including reference to tidal flood risk in the area, and requiring contact with the Environment Agency should strengthen the SPD. Furthermore, it is recommended to reference the sequential and exemption testing required under PPS 25: Development and Flood Risk;
15. The SPD could include encouragement for Car Share schemes; and
16. The SPD could be strengthened by using stronger wording in regard to its 'welcoming' of public open space. Could be replaced with 'required' or 'preferred'.

## Statement on the difference the process has made to date

The findings and recommendations included in this report were used to inform the development of the SPD. This helped to ensure that any negative impacts on the environment, local economy or community were minimised and positive impacts enhanced. The Table below shows how the recommendations from the SA were considered in the refinement of the Brief.

SA Recommendation	Change (yes or no?)	Location and revised wording ( <u>underlined</u> )
1	Yes	Para 5.14 A public open space which could be in the form of a linear park or garden square, both of which should be internal to the site, <u>should be provided</u>
2	Yes	Para 5.20 In terms of planning contributions funding for education facilities will therefore need to be secured from the sites <u>and the Council will expect pre-application discussions on this basis.</u>
3	Yes	Para 7.2 To this end the Council will be seeking an accessible internal space with an entrance from Warwick Road which will be allocated as <u>a new health polyclinic with up to five general practitioners and community staff operating from the premises.</u> The floorspace requirement for this is estimated as <u>558 sq m (6000 sq ft).</u>
4	Yes	Para 9.1 The Royal Borough is an air quality management area because it fails to meet the annual mean nitrogen dioxide objective across most of the borough, the hourly objective at busy roadside locations, and PM <sub>10</sub> objectives at roadside locations. <u>Developers must</u>

		<u>therefore adequately assess the impact of their development to ensure that no deterioration in air quality occurs and a suitable air quality assessment should be submitted with any major planning application for the sites. Prior to the survey being undertaken the Director of Environmental Health should be consulted on the input data for the air quality model and receptor locations.</u>
5		<u>Para 8.8 The sites are located in Flood Zone 1 which is the lowest risk flood zone. For all sites over one hectare in Flood Zone 1 (Charles House and Homebase sites) a Surface Water Flood Risk Assessment is required by PPS25. As part of this assessment surface water run off should be reduced down to Greenfield run off rates (8/l/s/ha). This can be achieved by the adoption of SUDs. Techniques such as swales, permeable paving and green roofs can not only reduce surface run off but they can also improve water quality.</u>
6	Yes	Para 6.6 The Council would welcome the re-use of demolition materials especially if this can be achieved on site.
7		6.46 Street tree planting in Warwick Road and along the remaining edges of the sites should be included and the <u>existing trees should be safeguarded</u> 6.48 A 3m soil depth above any basement areas will enable mature trees and planting to be established. 6.49 The provision of new, private communal green area(s) for amenity will be sought in the form of internal courtyard(s) that could be located at ground or upper floor levels and include tree planting, climbers and nesting boxes for birds. There is also an opportunity for bat roost bricks to be included in the façade and vegetated walls.
8	N/A	N/A
9	Yes	6.46 Street tree planting in Warwick Road and along the remaining edges of the sites should be included and the <u>existing trees should be safeguarded</u> 6.48 A 3m soil depth above any basement areas will enable mature trees and planting to be established. 6.49 The provision of new, private communal green area(s) for amenity will be sought in the form of internal courtyard(s) that could be located at ground or upper floor levels and include tree planting, climbers and nesting boxes for birds. There is also an opportunity for bat roost bricks to be included in the façade and vegetated walls.
10	Yes	Para 6.42
11	No	Given the amount of floorspace that is likely to be devoted to non residential purposes priority will be given to community facilities on the Warwick Road frontage.
12	Yes	Para 6.41
13	Yes	Para 6.29 Amended to: The Council considers that the sites within this brief offer an excellent opportunity for a model eco-development and considerable weight will be afforded to schemes that demonstrate significant reductions in

		<p>energy use and <u>natural resources (such as water) consumption. We therefore <b>require</b> applications to demonstrate this ambition through, <b>where feasible</b>, meeting EcoHomes 'Excellent' rating or Code for Sustainable Homes 4* or above, and BREEAM 'Excellent' in the case of non-residential uses. <b>In each case, a pre-assessment should be submitted with the planning application.</b></u></p> <p><b><u>Where it is not feasible to meet these requirements, developers will be required to demonstrate why this is the case</u></b></p>
14	Yes	<p>Para 8.8 <u>The sites are located in Flood Zone 1 which is the lowest risk flood zone. For all sites over one hectare in Flood Zone 1 (Charles House and Homebase sites) a Surface Water Flood Risk Assessment is required by PPS25. As part of this assessment surface water run off should be reduced down to Greenfield run off rates (8/l/s/ha). This can be achieved by the adoption of SUDs. Techniques such as swales, permeable paving and green roofs can not only reduce surface run off but they can also improve water quality.</u></p>
15	Yes	<p>Para 9.10 <u>In order to provide alternatives to private car ownership the provision of car club bays within the development sites will be encouraged. Such bays should be provided from the residential parking provision for each development and should not be additional parking bays. These bays will need to be publicly available. Car club is popular and expanding rapidly in the borough. The provision of bays in this location will supplement the borough's extensive on-street network of car club bays and form an attractive benefit to residents of the brief area.</u></p> <p>Para 9.10 <u>For non-residential development staff changing facilities and showers should be provided.</u></p>
16	Yes	<p>Para 5.14 <u>A public open space which could be in the form of a linear park or garden square, both of which should be internal to the site, should be provided</u></p>

## How to comment on the report

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# 1 Background

## 1.1 Purpose of Sustainability Appraisal

- 1.1.1 As part of the commission for undertaking the Sustainability Appraisal (SA) of the Royal Borough of Kensington and Chelsea's (RBKC) emerging Local Development Framework (LDF), Scott Wilson were commissioned to undertake the SA of the Warwick Road Planning Brief Supplementary Planning Document SPD ('the SPD').
- 1.1.2 The Planning and Compulsory Purchase Act (PCPA) (2004)<sup>1</sup> requires that all Local Development Documents (LDD) undergo SA. SPDs are considered LDDs and as such require an SA.
- 1.1.3 The recent Barker Review and Planning White Paper have set out the Governments future view on the planning system, including the requirements for the SA of SPDs. A key component of their recommendations is the possible future exemption of SPDs from requiring SA. Regardless, at the current time it is still a statutory requirement for SPDs to undergo SA, however, Scott Wilson has developed a SA 'lite' approach to SPDs which will be adopted for this SA. The main points of the SA 'lite' are:
- **Brevity** – the SA for the SPD should be brief and to the point, in some cases the matrix style approach has been dropped in favour of a commentary other type assessment.
  - **Accessibility** – by being brief and having a range of methods for illustrating findings, the SA becomes more accessible to both the Responsible Authority and to stakeholders.
- 1.1.4 The SEA Directive is (2001/42/EC)<sup>2</sup> is transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations 2004<sup>3</sup> (the SEA Regulations). The Government's approach to SA is to integrate the requirements of the SEA Directive (2001/42/EC) with SA using the Guidance issued by what was the Office of the Deputy Prime Minister (now the department of Communities and Local Government (CLG)); *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*<sup>4</sup>. Scott Wilson is following this guidance.
- 1.1.5 The SEA Directive, the Environmental Assessment of Plans and Programmes Regulations 2004 and the PCPA set out statutory processes that must be followed. The Quality Assurance checklist (Appendix I) has been used to ensure the requirements of these pieces of legislation are met. In addition to satisfying the requirements of the SEA Directive, PCPA and government Guidance, the SEA / SA process aims:

<sup>1</sup> Accessible via: <http://www.opsi.gov.uk/acts/acts2004/20040005.htm>

<sup>2</sup> Accessible via: [http://ec.europa.eu/environment/eia/full-legal-text/0142\\_en.pdf](http://ec.europa.eu/environment/eia/full-legal-text/0142_en.pdf)

<sup>3</sup> Accessible via: <http://www.opsi.gov.uk/SI/si2004/20041633.htm>

<sup>4</sup> Accessible via: [http://www.communities.gov.uk/embedded\\_object.asp?id=1161346](http://www.communities.gov.uk/embedded_object.asp?id=1161346)

- To promote sustainable development;
- To provide for a high level of environmental protection;
- To reflect global, national, regional and local concerns;
- To integrate sustainability and environmental considerations into all stages of the preparation of plans and programmes to create sustainable planning policies;
- To take a long term view of whether and how the area covered by the plan is expected to develop, taking account of the social, environmental and economic effects of the proposed plan; and
- To provide an audit trail of how the plan has been revised to take into account the findings of the SA.

## 1.2 This Report

1.2.1 The Guidance divides the appraisal into five stages, Stages A – E. Stage A sets the scope of the subsequent appraisal and was carried out and documented by the Borough in June/July 2007, the Scoping Report addendum which documents this information is available from the RBKC website<sup>5</sup>. Consultation was carried out on the Scoping Report Addendum and responses were integrated into the report.

1.2.2 This document is intended as a discussion paper that informs the development of the brief. It does adhere the Guidance and therefore will fulfil the requirements of Stages B and C of the SA process when finalised. Stage B forms the full assessment of the plan or programme and is based on the information included in the SA Scoping Report Addendum. The Guidance splits Stage B into 6 tasks as listed below. Stage B2 has been carried out by the Council and is documented in this report. Stage C involves the preparation of the SA report, which is satisfied by this document.

- **B1:** Testing the SPD objectives against the SA framework
- **B2:** Developing the SPD options
- **B3:** Predicting the effects of the draft SPD
- **B4:** Evaluating the effects of the draft SPD
- **B5:** Considering ways of mitigating adverse effects and maximising beneficial effects
- **B6:** Proposing measures to monitor the significant effects of implementing the SPD

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<sup>5</sup> Available on the RBKC website: [http://www.rbkc.gov.uk/Planning/localdevelopmentframework/ldf\\_page4.asp](http://www.rbkc.gov.uk/Planning/localdevelopmentframework/ldf_page4.asp)

## 1.3 Warwick Road Planning Brief SPD

1.3.1 The land on the northwest side of Warwick Road consists of four distinct sites which are located adjacent to each other. Running north to south they consist of Charles House, a vacant site formerly used by the Territorial Army and known as the TA site, the Empress Telephone Exchange site and Homebase with its accompanying car park. The brief sets out the principles that will shape the function and appearance of the development and its integration between the sites and within the local townscape. It offers a vision and provides guidance to ensure that appropriate infrastructure is delivered in a coordinated manner and in conjunction with development of the sites.

1.3.2 The Council considers that in order to achieve the optimum development potential of all four sites and to create a high quality well designed residential quarter with appropriate infrastructure, a masterplan approach is required.

1.3.3 A rigid masterplan is not advocated in this brief, instead it emphasises a flexible approach to stimulate creativity in design and layout. However, it is vital that the development of one site does not compromise the expectations of another and that adjoining landowners and developers work with the Council and the local community to achieve this.

**Relevant Planning Policies:**  
RBKC Unitary Development Plan (UDP) - Policies CD28, CD90 and MI1.  
London Plan - Policy 4B.1 Design Principles for a Compact City

1.3.4 The Planning Brief Supplementary Planning Document (SPD) is a component of the Local Development Framework of the Royal Borough of Kensington and Chelsea. It provides statutory guidance which supplements the Unitary Development Plan (UDP) adopted on May 25<sup>th</sup> 2002 and is consistent with national planning guidance and in general conformity with the Spatial Development Strategy (the London Plan). It may be updated in the future to reflect emerging Local Development Framework (LDF) policies.

## 1.4 Vision

1.4.1 The SPD sets out the following vision:

“A coordinated approach to the design of the four sites to achieve a holistic development which caters for the needs of new residents and respects the needs of the wider area in a well designed exemplar sustainable development that includes a new school, health facility, open space and other local amenities.

The Council is therefore seeking to create the right conditions for a sustainable neighbourhood with a sense of identity and place, creating a mix of uses that will support this aim and to create a model template for exemplar architecture and a coordinated and holistic sustainable development in the borough.

On this basis there is an opportunity to create a new area of townscape quality and good structural layout that draws from best practice urban design and the distinctive quality of the Royal Borough's traditional urban pattern. Key features are playing down the physical barrier created by the Warwick Road as a major traffic thoroughfare and integrating the development within its wider residential urban context, and providing new public open space that gives a focus and sense of place. A pedestrian and bicycle-friendly approach is promoted.

A coherent urban design strategy is required that creates new streets, squares and built forms, compositions and points of interest. Key design principles are:

- Connected and permeable layout;
- Medium –rise development;
- Sensitive enclosure of Warwick Road;
- Usable public open space as a focus;
- Contemporary mansion block typology;
- Active street frontages;
- New landmark school;
- Ecology area;
- High quality public realm including shared highway space;
- High design standards and quality finishes; and
- Highest standards of accessibility and inclusion”

## 2 Scope

2.1.1 In order to ensure that the assessment of the SPD is efficient and relevant, only those SA objectives where there is likely to be a reasonable potential for impacts from the adoption of the SPD were assessed. Appendix II contains the result of the exercise undertaken to identify which SA objectives are relevant for this SPD. Table 1 below shows a summary of the results in Appendix II.

**Table 3.1: SA Objective & SPD Relevance Summary**

SA Objective	Potential for SPD to impact on SA Objective?	Comments
1. To conserve and enhance the natural environment and biodiversity.	✓	Owing to this SPD being for the redevelopment of a site, it is not possible to exclude any of the SA objectives from this appraisal.
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, 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.	✓	
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 to maximise the re-use of buildings 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.	✓	

2.1.2 Once the relevant SA Objectives were identified, the assessment of the likely impacts from the adoption of the SPD was carried out. The impacts were then evaluated in order to determine whether significant effects were likely to occur.

2.1.3 The significance of effects was determined through consideration of the probability, duration, frequency, magnitude, spatial extent and permanency of likely impacts and the sensitivity and value of receptors to these impacts. The following scale was used:

***Table 3.2: Significance criteria***

Rank	Comments:
Significant negative effect	The plan or programme is likely to have a number of negative impacts which are likely to be of sufficient magnitude, frequency or duration to give rise to significant effects on sustainability.
Non significant negative effect	Some negative impacts are anticipated from the implementation of the plan or programme but the probability, magnitude, frequency or duration is not likely to cause significant effects on sustainability.
No significant effect	The impacts of the plan or programme are unlikely to be of sufficient magnitude, frequency or duration to cause significant effects.
Non significant positive effect	Some positive impacts are anticipated from the implementation of the plan or programme but the probability, magnitude, frequency or duration is not likely to cause significant effects on sustainability.
Significant positive effect	The plan or programme is likely to have a number of positive impacts which are likely to be of sufficient magnitude, frequency or duration to give rise to significant effects on sustainability.

2.1.4 Stages B3 and B4 were carried out using information in the LDF Scoping Report and SPD Scoping Addendum in addition to expert judgement and GIS

2.1.5 Table 3 below indicates where specific requirements of the SEA Directive can be found.

**Table 3.3: SEA Directive requirements checklist**

Environmental Report requirements <sup>6</sup>	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>Section 2.3</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>Scoping Report and Section 4.4</i>
(c) the environmental characteristics of areas likely to be significantly affected;	<i>Scoping Report</i>
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC (The Birds Directive) and 92/43/EEC (The Habitats Directive);	<i>Scoping Report</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	<i>Scoping Report</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>Section 4.4 and Appendix III</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>Section 5.1</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>Forthcoming</i>
(i) a description of the measures envisaged concerning monitoring in accordance with Article 10;	<i>Section 5.2</i>
(j) a non-technical summary of the information provided under the above headings.	<i>Section 1.1</i>

<sup>6</sup> 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)

## 2.2 Next Steps

- 2.2.1 Upon the completion of the SA Report, the report will be submitted for consultation alongside the draft SPD to the statutory consultees<sup>7</sup> and to other stakeholders (**Stage D** of the SA process). The comments are then to be integrated into the report<sup>8</sup>.
- 2.2.2 Public consultation on the SPD is required by Regulation 17 of the Town and Country Planning (Local Development) (England) Regulations, 2004. Issuing the SA Report alongside the SPD helps provide information for consultees on the likely impacts of different policy options on the environment and sustainability. Consultation on the SA Report also helps to verify the report's conclusions by drawing on the wide-ranging experiences of consultees.
- 2.2.3 The final stage of the SA process is **Stage E**. This consists of monitoring the significant effects of the plan or programme. This stage will be implemented following the adoption of the SA report and SPD, although suggestions for monitoring are included in this report.

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<sup>7</sup> The Statutory Consultees consist of the Environment Agency, Natural England and English Heritage.

<sup>8</sup> The SEA Directive, Article 8.

### 3 Assessment of the SPD

#### 3.1 Relevant UDP Policies

- 3.1.1 The Guidance states that:
- 3.1.2 *The SA of the SPD of a saved plan will however need to set out the likely significant social, environmental and economic effects of the DPD policy or that saved policy it is helping to implement. However, it is not necessary for a SA of a SPD to document the significant effects of the DPD or saved plan as a whole or of alternatives to the DPD policy or saved policy. This is advised to be undertaken at Stage B of the SA process.*
- 3.1.3 The relevant UDP policies are set out in Appendix III.

#### 3.2 B1 - Testing the SPD objectives against the SA Objectives

*'It is important for the objectives of the DPD to be in accordance with sustainability principles. The objectives should be tested for compatibility with the SA objectives.'*

**Section 3.3.4, Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, DCLG, 2005**

- 3.2.1 The SPD does not include explicit objectives. However, the SPD includes a Vision (included in Section 1.4). For the purposes of Task B1, this vision is treated as an Objective
- 3.2.2 Table 4.1 below provides an overview of how this vision compares to the sustainability objectives for the Royal Borough. The areas of uncertainty depend on the content and implementation of the SPD, which are addressed in the next chapter.

**Table 4.1: Comparison of SPD objective and SA objective:**

SA Objectives	Score
1. Conserve and enhance the natural environment and biodiversity?	+ Inclusion of open space and an ecology area should have positive impacts.
2. Reduce crime and anti-social behaviour and the fear of crime?	? Providing a connected and permeable layout and active street frontages should ensure there are no positive impacts. However, impacts will depend on implementation.
3. Support a diverse and vibrant local economy to foster sustainable economic growth?	? Providing local amenities and a high quality development should have positive impacts on this objective. However, impacts will depend on implementation.

4. Encourage social inclusion, equity, the promotion of equality and a respect for diversity?	<p style="text-align: center;">+</p> <p>A development that is connected and permeable and that seeks the highest standards of accessibility and inclusion should have positive impacts.</p>
5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables?	<p style="text-align: center;">?</p> <p>Impacts will depend on whether high design standards will include measures to reduce impacts on climate change.</p>
6. Reduce the risk of flooding to current and future residents?	<p style="text-align: center;">?</p> <p>Impacts depend on whether high design standards include flood risk mitigation measures.</p>
7. Improve air quality in the Royal Borough?	<p style="text-align: center;">?</p> <p>Promotion of a pedestrian and cycle friendly development should have positive impacts. However, impacts will depend on whether traffic increases.</p>
8. Protect and enhance the Royal Borough's parks and open spaces?	<p style="text-align: center;">++</p> <p>Usable open space as a focus should have very positive impacts.</p>
9. Reduce pollution of air, water and land?	<p style="text-align: center;">?</p> <p>There are unlikely to be negative impacts on this objective as it is to be a well-designed exemplar sustainable development.</p>
9a. Prioritize development on previously developed land?	<p style="text-align: center;">++</p> <p>The site is on previously developed land.</p>
10. Promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic?	<p style="text-align: center;">?</p> <p>Promotion of cycling and walking should have positive impacts. However may still be increases in traffic.</p>
11. Reduce the amount of waste produced and maximise the amount of waste that is recycled?	<p style="text-align: center;">?</p> <p>Impacts on waste are uncertain as development may increase arisings.</p>
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?	<p style="text-align: center;">++</p> <p>Provision of a new school, health facility, open space and other amenities should have very positive impacts.</p>
13. Contribute to the housing needs of the Royal Borough?	<p style="text-align: center;">++</p> <p>Provision of housing units that meets the needs of new residents and respects the needs of the wider area should have very positive impacts.</p>
14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials?	<p style="text-align: center;">?</p> <p>An exemplar sustainable development and high design standards should help ensure positive impacts however this is not necessarily the case.</p>
15. Ensure the provision of accessible health	<p style="text-align: center;">++</p>

care for all Borough residents?	Provision of a health facility should have very positive impacts.
16.Reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage?	++ A well-designed exemplar sustainable development which creates a high quality public realm, is of high design standard and a sense of place should have very positive impacts.

Key:

Symbol	Likely effect against the SA Objective
++	Very beneficial
+	Beneficial
0	None
?	Uncertain or insufficient information on which to determine
-	Negative
--	Major Negative

### 3.3 B2 – Developing the SPD options

The SEA Directive requires that *'reasonable alternatives' to a plan or programme are 'identified, described and evaluated'* and the reasons for *'selecting the alternatives dealt with'* are included in the SA Report.

**SEA Directive, Annex I (h)**

These requirements are transposed into the Environmental Assessment of Plans and Programmes Regulations (2004).

Additionally, the Guidance states that *'LPAs will develop options, working with the community and relevant stakeholders, to achieve the objectives of the DPD'*.

**Section 3.3.5, Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, DCLG, 2005**

- 3.3.1 The SPD sets out the Council's requirements for the development of the Warwick Road sites. Therefore, the requirements the SPD contain have been based on UDP policies and on regional and national policy and legislation. In consultation with the Council, the following options were identified in the Planning Brief. These are in addition to the business as usual scenario, which is not adopting the SPD.

### Issue 1: Adoption of SPD

A SPD should seek to improve on the situation that would exist if the SPD were not to be adopted. As a result, the best practice approach to SA includes the appraisal of the likely impacts of adopting and not adopting the SPD.

Option a: Adopt SPD

Option b: Do not adopt SPD

### Issue 2: Preferred use of the site

The sites are outside a designated town centre location. Therefore the sequential test will apply and obviously Kensington High Street, being the nearest Principal Shopping Centre would be the preferred choice for retail, leisure and entertainment facilities, offices, culture and tourism uses as reflected in paragraph 1.8 of PPS6.

In terms of residential the housing target set out in the London Plan is 3,500 net additional homes to be delivered between 2007/8 and 2016/17. This figure was derived from the GLA's 2004 Housing Capacity Study and to achieve this the Warwick Road sites will need to come forward for residential development. There is also an affordable housing target of 1000 units to be delivered over the period 2007-2017.

Therefore, the preferred use of the site has been identified as residential-led. However, both options are to be appraised to identify the likely impacts of their implementation on sustainability.

Option a: Residential led

Option b: Dominance of other uses (not carried forward)

### Issue 3: Scope of SPD

The draft SPD contains detailed requirements for the development of the site within the context of a residential-led development. The Council can either insist that all requirements included within the draft are included in development proposals for the site or can require a selection of options to be included.

Option a: All requirements in current draft (options 4a to 4g)

Option b: Selection of options for requirements

### Issue 4: Selection of requirements included in the SPD

The Options a-g below include the current requirements of the SPD. However, these features are to be appraised in order to evaluate the likely effects on sustainability of each should Option 3b be selected. The effects of the combination of options selected will be appraised upon finalisation of the draft SPD.

Option a: Affordable housing

Option b: Education facilities
Option c: Health care facilities
Option d: Open Space
Option e: Retail/Commercial units
Option f: Sustainable transport provision
Option g: Sustainable construction and design
Option h: Provision of a Youth facility

### 3.4 B3 & B4 – Predicting and evaluating the effects of the SPD

The SEA Directive requires the environmental assessment to identify, describe and evaluate'...*'the likely significant effects on the environment of a plan or programme'* Annex II of the SEA Directive provides criteria which help determine the likely significance of an effect.

**SEA Directive, Article 5 & Annex II**

The Guidance states that the *'purpose of this task is to predict the social, environmental and economic effects of the options being considered in the DPD process'*. Also, the Guidance states that *'having identified and described the likely effects of the DPD, an evaluation of their significance needs to be made'*.

**Sections 3.3.11 and 3.3.15, Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, DCLG, 2005.**

- 3.4.1 This section details the results of the assessment of the SPD. The full appraisal results are presented in matrices in Appendix III.

#### Issue 1: Adoption of SPD

- 3.4.2 **Option A:** Without the SPD, there is a risk that the four sites are taken forward independently. This may result in a lack of joined-up development, which may have negative impacts on the local economy, local distinctiveness, provision of open space and social and community facilities. In addition, the potential opportunities for inclusion of waste minimisation and recycling facilities, energy efficiency measures, on-site energy generation, flood attenuation measures and traffic minimisation gained from a larger site may not be viable for the individual sites. The significance of impacts is likely to be determined by the requirements of the Council for the development of each of the sites.
- 3.4.3 **Option B:** Adoption of the Warwick Road Planning Brief SPD should have a number of positive effects. The SPD includes a raft of measures to help ensure that impacts on

traffic, climate change, waste generation, crime and pollution generation are minimised. The SPD also includes requirements for provision of affordable housing, open space, health care and education facilities, which should have positive impacts for the existing community and new residents. There could also be indirect positive impacts for biodiversity and the natural environment from open space provision and direct impacts from inclusion of landscaping, native species, a buffer adjacent to the West London line and District Lines SNCI and a wildlife pond. Adoption of the SPD should help ensure the co-ordinated development of the sites, which provides opportunities for energy efficiency, waste management and sustainable transport measures and retail/commercial units to be included with the development. Finally, the SPD includes measures to design out crime, which should have positive impacts.

- 3.4.4 Both options will involve previously developed land being re-developed. Impacts on local distinctiveness will depend on the proposals under each option. Some parts of the site are within a flood zone, which means certain uses may not be suitable. It is likely that a flood risk assessment will be required.

## Issue 2: Preferred use of the site

- 3.4.5 **Option A: Residential led:** A residential led development on the site will help meet the needs for housing in the Borough. Inclusion of requirements in the SPD for affordable housing should also help address housing needs and have positive impacts on social inclusion. There could be indirect positive impacts on the local economy through housing provision but also through inclusion of retail/commercial units. A residential-led development is likely to lead to increased traffic, waste generation, energy use and demand for social/community facilities and open space. However, provided the requirements of the SPD are fully implemented the potential impact on these features should be mitigated. Some areas of the site are within a flood risk zone which suggests that residential uses may not be suitable on some parts of the site. A flood risk assessment is likely to be required.
- 3.4.6 **Option B: Dominance of other uses:** The impacts of a dominance of other uses, rather than mainly residential, on the site will depend largely on the type of uses selected. For example, a predominantly retail/commercial development could have positive impacts on the local economy but may lead to increased traffic and reduced opportunities for open space provision. Moreover, impacts would also be determined by the specific type of activities encouraged within different use types e.g. whether commercial development would consist of predominantly small office units or large warehouse space. There are likely to be negative impacts on housing provision in the Borough from this option. Impacts on the natural environment would depend on the level of open space provision and the nature of development proposals. Two of the four sites require a Surface Water Flood Risk Assessment to be undertaken which will require surface water run off to be reduced to Greenfield run off rates (8l/s/ha). This may affect their layout and planning, with the amount of hard surfacing being a critical factor.

### Issue 3: Scope of the SPD

- 3.4.7 **Option A: All requirements in the current draft:** Insisting that all requirements in the SPD are included in development proposals for the site should have significant positive impacts for meeting local needs through inclusion of affordable housing and provision of open space and social and community facilities. There are also likely to be positive impacts on the natural environment, crime prevention, the local economy and social inclusion from the SPD. The development may lead to increased energy and resource demands, traffic (and subsequent air pollution) flood risk, and waste generation. However, the SPD includes a range of measures that should mitigate these impacts. Two of the sites are larger than a hectare in area which suggests a flood risk assessment is will to be required and this could be set out in the SPD. Overall, this option would have positive impacts for sustainability.
- 3.4.8 **Option B: Selection of requirements:** It is assumed that at a minimum, all the requirements of the SDP will be met by the future applications. However, there may in exceptional cases be areas where an application may not meet all the requirements of the SPD. In cases where the applicant believes it is not viable or feasible to meet the requirements, a supporting study should be provided to inform any decisions regarding any further selection of requirements and potential offsets. The impacts of this Option will therefore remain uncertain as they will depend on which requirements and detail are included in future planning applications for the sites. For example impacts on climate change will depend on whether energy efficiency and green transport measures are included in a future planning application and impacts on social or community facilities on the level of provision required by the SPD. Therefore, it is likely that there will be negative impacts on some objectives if certain features are removed. For example, if the requirement for provision of a primary school is not achieved, the performance of the SPD against SA objective 12 may worsen. In order to minimise negative impacts from this option, the requirements taken forward in the SPD should be closely tailored to the needs of the site and surrounding area. The option of off-setting the failure to met one requirement with gains above requirements in other areas should be considered (i.e. if there is no opportunity for open space, then it may be created of-site, or an entirely different requirement could be supported, such as increased renewables provision).

### Issue 4: Selection of requirements included in the SPD

- 3.4.9 **Option A: Affordable Housing:** Inclusion of affordable housing units on the site should have positive impacts on meeting the Borough's housing needs and encouraging social inclusion. There could also be positive impacts on the local economy by encouraging people to be able to live and work in the area. Impacts on the other objectives are unlikely to be significant from this option. However, it needs to be noted that residential provision on the site may lead to increases in waste generation, traffic and resource use. This is also the case for educational facilities, health care facilities and retail/commercial units (Option B, C and E).

- 3.4.10 **Option B: Educational facilities:** Provision of education facilities should have significant positive impacts on social and community facilities in the area, particularly as there is a growing demand for education facilities in this part of the Borough. This option should also help encourage social inclusion. Provision of educational facilities may have indirect positive impacts on the local economy through encouraging people to want to live and work in the area. Provision of educational facilities may lead to increased traffic generation in the area, which could have negative impacts on congestion, air quality and climate change. There may also be increased resource use and waste generation from this option. Impacts on open space provision and provision of other facilities will depend on whether educational facilities are provided at the expense of these facilities/open space. As the site is in an area of Open Space deficiency, there could be negative impacts if this were to be the case.
- 3.4.11 **Option C: Health Care facilities:** Provision of health care facilities on the site should have significant positive impacts on provision of social and community facilities, particularly as the RBKC Primary Care Trust (PCT) have identified that *'further capacity for health and social care facilities will be required in the Warwick Road area as a result of significant residential development'*. There should also be positive impacts for social inclusion from this Option. Provision of health care facilities could lead to an increase in traffic, waste and resource use. Impacts on open space and other facility provision will depend on whether health care facilities are provided at the expense of these facilities/open space.
- 3.4.12 **Option D: Amenity Space:** Provision of amenity space on the site should have significant positive impacts for open space provision in the area. The site is located in an area of Open Space Deficiency so provision of open space should be particularly beneficial. There are likely to be indirect positive impacts on the natural environment from provision of amenity space as the SPD encourages use of native species and a buffer adjacent to the West London Line and District Lines SNCI. Provision of amenity space should also help create a high quality local environment. This could attract people to the area and have positive impacts on the local economy and possibly also on meeting housing needs. There are unlikely to be significant impacts from this option on the other SA objectives. Some areas of the site are within a flood risk zone which suggests that amenity space may be suitable uses on some parts of the site. A flood risk assessment is likely to be required.
- 3.4.13 **Option E: Retail/Commercial units:** Provision of retail and commercial units on the site should have significant positive impacts on the local economy. There are unlikely to be significant impacts on provision of social/community facilities or on social inclusion as long as provision of these units is not at the expense of other facilities/open space. Provision of retail and commercial units could lead to increased traffic generation. There could also be increases in waste arisings. Significant impacts on other SA objectives are not anticipated.

- 3.4.14 **Option F: Sustainable Transport:** This Option should have significant positive impacts on traffic and transport once the development is operational. This should also have positive impacts for climate change and reducing air pollution. However, there may be increased traffic during construction of the development which needs to be taken into consideration. Impacts of inclusion of sustainable transport measures on other SA objectives are not anticipated to be significant.
- 3.4.15 **Option G: Sustainable Construction and Design:** Inclusion of sustainable construction and design measures into the SPD should have significant positive impacts on energy efficiency and on climate change. There could also be positive impacts on the natural environment through inclusion of green or brown roofs. This option could have potential implications for local distinctiveness should innovative technologies or designs be included in the development. Inclusion of waste minimisation plant on site and recycling facilities should have positive impacts on this objective. However, there is also likely to be significant volume of waste arising from demolition on the site. Inclusion of flood attenuation features should have positive impacts on flood risk and pollution. Impacts on other SA objectives are unlikely to be significant.
- 3.4.16 **Option H: Creation of a Youth facility:** The inclusion of youth facilities may have a positive effect on the reduction of crime and anti-social behaviour. Additional benefits may occur through the encouragement of social inclusion and equity. The provision of a youth centre will certainly perform well in regard to ensuring the provision of new community facilities. However it will be important to ensure that any transport infrastructure catering for the centre has encouraging alternatives to the car at its heart, and actively encourage healthier transport modes.

## Business as usual

The Guidance states that those preparing a SPD are under a duty 'to set out to improve the situation that would exist if there was no SPD. It should also aim to improve on the effects of the existing parent DPD or 'saved plan policy'. To test this, options considered often include scenarios termed 'no plan' and 'business as usual'.

**Section 4.3.6, Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, DCLG, 2005**

- 3.4.17 Without the SPD, there is a risk that the four sites are taken forward independently. This may result in a lack of joined-up development, which may have negative impacts on the local economy, local distinctiveness, provision of open space and social and community facilities. In addition, the potential opportunities for inclusion of waste minimisation and recycling facilities, energy efficiency measures, on-site energy generation, flood attenuation measures and traffic minimisation gained from a larger site may be lost due to smaller individual sites being taken forward. The significance of impacts is likely to be determined by the requirements of the Council for the development of each of the sites. Some areas of the site are within a flood risk zone, which suggests a flood risk assessment will be required.

## 3.5 Cumulative effects

- 3.5.1 The nature of the site is such that cumulative effects, particularly due to construction, may have significant impacts on the surrounding receptors, and those that reside in the development whilst other elements are being completed. Clearly therefore, a holistic approach to the site(s) provides an opportunity for a cohesive set of mitigative processes that can be put in place for each of the sites as part of a site wide Construction Environmental Management Plan (CEMP).
- 3.5.2 Furthermore, the provision of renewable energy on site, in addition to energy reduction technologies such as Combined Heat and Power (CHP) and District Heating lend themselves to larger, integrated development. Whilst this development may not be integrated per se, a holistic approach clearly has the advantage of joined up thinking.
- 3.5.3 In conclusion, and as far as cumulative effects are concerned, the adoption and use of the SPD provides a measure of mitigation against the effects that might otherwise occur in the absence of the SPD.

## 4 Mitigation and Monitoring

### 4.1 B5 – Mitigation

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**

The Guidance applies the SEA Directive requirements, stating that '*the SA Report must include measures to prevent, reduce or offset significant adverse effects of implementing the SPD*'.

**Section 4.3.19, Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, DCLG, 2005**

4.1.1 The following mitigation measures were identified as a result of the appraisal of the different issues and options:

1. The SPD could strengthen its position in line with national guidance to include requirements to enhance biodiversity on and around the site. Given the number of trees present there could be potential for breeding birds and bats;
2. The SPD could include reference to the Designing Out Crime SPD to strengthen requirements for high standards of security and crime prevention;
3. The potential inclusion of office units in the development could be considered. The existing use sets a precedence for this and may need to be replaced;
4. The SPD could reference to the Access Design Guide SPD to help ensure requirements for people with special mobility needs are incorporated into the development;
5. The SPD could require the achievement of a six star rating under the Code for Sustainable Homes. The SPD can be further strengthened by the addition of requirements for reuse of demolition materials;
6. Including reference to tidal flood risk in the area, and requiring contact with the Environment Agency should strengthen the SPD. Furthermore, it is recommended to reference the sequential and exemption testing required under PPS 25: Development and Flood Risk;
7. The SPD could include encouragement for Car Share schemes; and

8. The SPD could be strengthened by using stronger wording in regard to its 'welcoming' of public open space. Could be replaced with 'required' or 'preferred'.

4.1.2 However, it is recognised that if the SPD sets out too stringent requirements, development of the site may not be economically viable. This could have negative impacts on meeting housing needs in the Borough. As a result, the following should be taken into consideration when deciding the requirements that will be included in the final SPD:

9. The site is in an area of Open space deficiency which would be exacerbated by residential development;
10. There is a large and increasing demand for primary school places in this area of the Borough. Residential development could further raise demand for education facilities;
11. The RBKC PCT have indicated that additional health facilities will be required with new residential development. Without inclusion of health facilities, needs of existing and future residents may not be met;
12. The whole Borough is in an AQMA and Warwick road and Kensington High Street are busy thoroughfares. As a result the area is particularly sensitive to increases in traffic which could lead to increased congestion and deteriorating air quality;
13. Parts of the site are in a flood risk zone. As a result, a Flood Risk Assessment is likely to be required and its findings included into development proposals;
14. Demolition of buildings and operation of the development could give rise to large volumes of waste. Sustainable use of this waste should be considered; and
15. The site is adjacent to the West London and District Lines SNCI which although not a national designation, should be protected and enhanced wherever possible; and
16. Flexibility with requirements of the SPD could ensure that the development meets needs of the local area and future residents but could reduce the performance of the development with respect to overall sustainability for example in terms of energy efficiency.

## 4.2 B6 – Monitoring

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**

4.2.1 In order to ensure significant adverse effects do not occur as a result of the development, the following indicators could be monitored:

- Dust, NO<sub>x</sub> and PM<sub>10</sub> emissions;
- Traffic flows;
- Recycling rate;
- Affordable housing completions;
- Unmet demand for education and health facilities following development; and
- Open space provision per 'x' residents.

### 4.3 Difficulties encountered in compiling information or carrying out the assessment

The SEA Directive requires 'any difficulties (such as technical difficulties or lack of know-how) encountered in compiling the required information' be included in the report.

**Annex 1 (h), the SEA Directive**

4.3.1 There are a range of recommendations where more information would provide a more accurate picture of possible impacts of the development of these sites. In particular:

- Height of structures;
- Timescales and in particular phasing of developments.

### 4.4 Statement of changes resulting from the SEA/SA process

4.4.1 As a result of the SA process, a number of recommendations were made (as highlighted in Section 4.1.1). These were considered by RBKC and integrated, where they thought appropriate, into the Planning Brief. Table 4.1 illustrates the recommendations and related changes.

**Table 4.1: SA Recommendations and changes made to planning brief**

SA Recommendation	Change (yes or no?)	Location and revised wording ( <u>underlined</u> )
1	Yes	Para 5.14 A public open space which could be in the form of a linear park or garden square, both of which should be internal to the site, <u>should be provided</u>
2	Yes	Para 5.20 In terms of planning contributions funding for education facilities will therefore need to be secured from the sites <u>and the Council will expect pre-application discussions on this basis.</u>
3	Yes	Para 7.2 To this end the Council will be seeking an accessible internal space with an entrance from Warwick Road which will be allocated as <u>a new health polyclinic with up to five general practitioners and community staff operating from the premises.</u> The floorspace requirement for this is estimated as <u>558 sq m (6000 sq ft).</u>
4	Yes	Para 9.1 The Royal Borough is an air quality management area because it fails to meet the annual mean nitrogen dioxide objective

		across most of the borough, the hourly objective at busy roadside locations, and PM <sub>10</sub> objectives at roadside locations. <u>Developers must therefore adequately assess the impact of their development to ensure that no deterioration in air quality occurs and a suitable air quality assessment should be submitted with any major planning application for the sites. Prior to the survey being undertaken the Director of Environmental Health should be consulted on the input data for the air quality model and receptor locations.</u>
5		Para 8.8 <u>The sites are located in Flood Zone 1 which is the lowest risk flood zone. For all sites over one hectare in Flood Zone 1 (Charles House and Homebase sites) a Surface Water Flood Risk Assessment is required by PPS25. As part of this assessment surface water run off should be reduced down to Greenfield run off rates (8l/s/ha). This can be achieved by the adoption of SUDs. Techniques such as swales, permeable paving and green roofs can not only reduce surface run off but they can also improve water quality.</u>
6	Yes	Para 6.6 The Council would welcome the re-use of demolition materials especially if this can be achieved on site.
7		6.46 Street tree planting in Warwick Road and along the remaining edges of the sites should be included and the <u>existing trees should be safeguarded</u> 6.48 <u>A 3m soil depth above any basement areas will enable mature trees and planting to be established.</u> 6.49 The provision of new, private communal green area(s) for amenity will be sought in the form of internal courtyard(s) that could be located at ground or upper floor levels and include tree planting, climbers and <u>nesting boxes for birds. There is also an opportunity for bat roost bricks to be included in the façade and vegetated walls.</u>
8	N/A	N/A
9	Yes	6.46 Street tree planting in Warwick Road and along the remaining edges of the sites should be included and the <u>existing trees should be safeguarded</u> 6.48 <u>A 3m soil depth above any basement areas will enable mature trees and planting to be established.</u> 6.49 The provision of new, private communal green area(s) for amenity will be sought in the form of internal courtyard(s) that could be located at ground or upper floor levels and include tree planting, climbers and <u>nesting boxes for birds. There is also an opportunity for bat roost bricks to be included in the façade and vegetated walls.</u>
10	Yes	Para 6.42
11	No	Given the amount of floorspace that is likely to be devoted to non residential purposes priority will be given to community facilities on the Warwick Road frontage.
12	Yes	Para 6.41
13	Yes	Para 6.29 Amended to: The Council considers that the sites within this brief offer an excellent

		<p>opportunity for a model eco-development and considerable weight will be afforded to schemes that demonstrate significant reductions in energy use and <u>natural resources (such as water) consumption</u>. We therefore <b>require</b> applications to demonstrate this ambition through, <b>where feasible</b>, meeting EcoHomes 'Excellent' rating or Code for Sustainable Homes 4* or above, and BREEAM 'Excellent' in the case of non-residential uses. <b><u>In each case, a pre-assessment should be submitted with the planning application.</u></b></p> <p><b><u>Where it is not feasible to meet these requirements, developers will be required to demonstrate why this is the case</u></b></p>
14	Yes	<p>Para 8.8 <u>The sites are located in Flood Zone 1 which is the lowest risk flood zone. For all sites over one hectare in Flood Zone 1 (Charles House and Homebase sites) a Surface Water Flood Risk Assessment is required by PPS25. As part of this assessment surface water run off should be reduced down to Greenfield run off rates (8l/s/ha). This can be achieved by the adoption of SUDs. Techniques such as swales, permeable paving and green roofs can not only reduce surface run off but they can also improve water quality.</u></p>
15	Yes	<p>Para 9.10 <u>In order to provide alternatives to private car ownership the provision of car club bays within the development sites will be encouraged. Such bays should be provided from the residential parking provision for each development and should not be additional parking bays. These bays will need to be publicly available. Car club is popular and expanding rapidly in the borough. The provision of bays in this location will supplement the borough's extensive on-street network of car club bays and form an attractive benefit to residents of the brief area.</u></p> <p>Para 9.10 <u>For non-residential development staff changing facilities and showers should be provided.</u></p>
16	Yes	<p>Para 5.14 <u>A public open space which could be in the form of a linear park or garden square, both of which should be internal to the site, should be provided</u></p>

## 5 Appendix I

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.

*Table 5: SEA Directive requirements checklist*

Guidance checklist	Section	Carried out by	When
<b>Objectives and context</b>			
<ul style="list-style-type: none"> <li>The plan's purpose and objectives are made clear.</li> </ul>	Sections 2.3 and 2.4	Scott Wilson	August 2007
<ul style="list-style-type: none"> <li>Sustainability issues, including international and EC objectives, are considered in developing objectives and targets.</li> </ul>	Scoping Report Addendum	Scott Wilson	January 2006
<ul style="list-style-type: none"> <li>SA objectives are clearly set out and linked to indicators and targets where appropriate.</li> </ul>	Scoping Report Addendum	Scott Wilson	January 2006
<ul style="list-style-type: none"> <li>Links with other related plans, programmes and policies are identified and explained.</li> </ul>	Scoping Report Addendum & Appendix III	Scott Wilson	January 2006 & August 2007
<ul style="list-style-type: none"> <li>Conflicts that exist between SA objectives, between SA and plan objectives, and between SA and other plan objectives are identified and described.</li> </ul>	Section 4.2	Scott Wilson	May 2007
<b>Scoping</b>			
<ul style="list-style-type: none"> <li>The environmental consultation bodies are consulted in appropriate ways and at appropriate times on the content and scope of the SA Report.</li> </ul>	Scoping Report Addendum	Scott Wilson	January 2006
<ul style="list-style-type: none"> <li>The appraisal focuses on significant issues.</li> </ul>	Chapter 3 and 4	Scott Wilson	August 2007
<ul style="list-style-type: none"> <li>Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit.</li> </ul>	Chapter 3 and Section 5.3	Scott Wilson	August 2007
<ul style="list-style-type: none"> <li>Reasons are given for eliminating issues from further consideration.</li> </ul>	Chapter 3	Scott Wilson	August 2007
<b>Options/Alternatives</b>			
<ul style="list-style-type: none"> <li>Realistic alternatives are considered for key issues, and the reasons for choosing them are documented.</li> </ul>	Chapter 4	Scott Wilson	August 2007
<ul style="list-style-type: none"> <li>Alternatives include 'do nothing' and/or 'business as usual' scenarios wherever relevant</li> </ul>	Chapter 4	Scott Wilson	August 2007
<ul style="list-style-type: none"> <li>The sustainability effects (both adverse and</li> </ul>	Chapter 4	Scott Wilson	August 2007

beneficial) of each alternative are identified and compared			
<ul style="list-style-type: none"> <li>Inconsistencies between the alternatives and other relevant plans, programmes or policies are identified and explained.</li> </ul>	Chapter 4	Scott Wilson	August 2007
<ul style="list-style-type: none"> <li>Reasons are given for selection or elimination of alternatives.</li> </ul>	Forthcoming	Scott Wilson	Forthcoming
<b>Baseline information</b>			
<ul style="list-style-type: none"> <li>Relevant aspects of the current state of the environment and their likely evolution without the plan are described.</li> </ul>	Scoping Report Addendum	Scott Wilson	January 2006
<ul style="list-style-type: none"> <li>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.</li> </ul>	Scoping Report Addendum & Section 2.3	Scott Wilson	January 2006 & August 2007
<ul style="list-style-type: none"> <li>Difficulties such as deficiencies in information or methods are explained.</li> </ul>	Scoping Report Addendum & Section 5.3	Scott Wilson	January 2006 & August 2007
<b>Prediction and evaluation of likely significant effects</b>			
<ul style="list-style-type: none"> <li>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.</li> </ul>	Chapter 4	Scott Wilson	August 2007
<ul style="list-style-type: none"> <li>Both positive and negative effects are considered, and where practicable, the duration of effects (short, medium or long-term) is addressed.</li> </ul>	Chapter 4	Scott Wilson	August 2007
<ul style="list-style-type: none"> <li>Likely secondary, cumulative and synergistic effects are identified where practicable.</li> </ul>	Chapter 4	Scott Wilson	August 2007
<ul style="list-style-type: none"> <li>Inter-relationships between effects are considered where practicable.</li> </ul>	Chapter 4	Scott Wilson	August 2007
<ul style="list-style-type: none"> <li>Where relevant, the prediction and evaluation of effects makes use of accepted standards, regulations, and thresholds.</li> </ul>	Chapter 4	Scott Wilson	August 2007
<ul style="list-style-type: none"> <li>Methods used to evaluate the effects are described.</li> </ul>	Chapter 3	Scott Wilson	August 2007
<b>Mitigation measures</b>			
<ul style="list-style-type: none"> <li>Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan are indicated.</li> </ul>	Chapter 5	Scott Wilson	August 2007
<ul style="list-style-type: none"> <li>Issues to be taken into account in development consents are identified.</li> </ul>	NA	NA	NA

<b>The Sustainability Appraisal Report</b>			
<ul style="list-style-type: none"> <li>Is clear and concise in its layout and presentation.</li> </ul>	This report	Scott Wilson	August 2007
<ul style="list-style-type: none"> <li>Uses simple, clear language and avoids or explains technical terms.</li> </ul>	This report	Scott Wilson	August 2007
<ul style="list-style-type: none"> <li>Uses maps and other illustrations where appropriate.</li> </ul>	Scoping Report Addendum & this report	Scott Wilson	January 2006, August 2007
<ul style="list-style-type: none"> <li>Explains the methodology used.</li> </ul>	Chapter 3	Scott Wilson	August 2007
<ul style="list-style-type: none"> <li>Explains who was consulted and what methods of consultation were used.</li> </ul>	Scoping Report Addendum & Section 3.2	Scott Wilson	August 2007
<ul style="list-style-type: none"> <li>Identifies sources of information, including expert judgement and matters of opinion.</li> </ul>	Chapter 3	Scott Wilson	August 2007
<ul style="list-style-type: none"> <li>Contains a non-technical summary.</li> </ul>	Section 1.1	Scott Wilson	August 2007
<b>Consultation</b>			
<ul style="list-style-type: none"> <li>The SA is consulted on as an integral part of the plan-making process.</li> </ul>	Scoping Report Addendum & this report	Scott Wilson, RBKC	January 2006, August 2007
<ul style="list-style-type: none"> <li>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.</li> </ul>	Scoping Report Addendum & this report	Scott Wilson, RBKC	January 2006, August 2007
<b>Decision-making and information on the decision</b>			
<ul style="list-style-type: none"> <li>The SA Report and the opinions of those consulted are taken into account in finalising and adopting the plan.</li> </ul>	Forthcoming	RBKC	
<ul style="list-style-type: none"> <li>An explanation is given of how they have been taken into account.</li> </ul>	Forthcoming	RBKC	
<ul style="list-style-type: none"> <li>Reasons are given for choices in the adopted plan, in the light of other reasonable options considered.</li> </ul>	Forthcoming	RBKC	
<b>Monitoring measures</b>			
<ul style="list-style-type: none"> <li>Measures proposed for monitoring are clear, practicable and linked to the indicators and objectives used in the SA.</li> </ul>	Chapter 5	Scott Wilson	August 2007
<ul style="list-style-type: none"> <li>Monitoring is used, where appropriate, during implementation of the plan to make good deficiencies in baseline information in the SA.</li> </ul>	Forthcoming		
<ul style="list-style-type: none"> <li>Monitoring enables unforeseen adverse effects to be identified at an early stage (These effects may</li> </ul>	Forthcoming		

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include predictions which prove to be incorrect.)			
<ul style="list-style-type: none"><li>Proposals are made for action in response to significant adverse effects.</li></ul>	Forthcoming		

## 6 Appendix II

Key:

●●●	Impact likely and potentially significant
●●	Impact likely but nature of impact uncertain
●	No impact considered likely

SA Objective	Issue 1: Adoption of SPD	Issue 2: Preferred use of the site	Issue 3: Scope of SPD	Issue 4: Selection of requirements included in the SPD
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, 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.	●●●	●●●	●●●	●●●
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 to maximise the re-use of buildings 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	●●	●●	●●	●●

**RBKC**

SA of RBKC Warwick Road Planning Brief SPD



conservation and enhancement of cultural heritage.				
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## 7 Appendix III – Assessment Matrices

### 7.1 UDP Policy

#### CD28

7.1.1 To require development to be physically and visually integrated into its surroundings by:

- a) preserving existing public routes, creating new routes where appropriate, and extending links to maintain a high level of accessibility, (see Transportation Chapter)
- b) ensuring that the appearance of buildings form pattern which reflects the traditional urban form of the Borough, by maintaining and creating new building lines and giving a coherent form to the spaces enclosed by new buildings. Buildings and features should also be designed to emphasise the relative importance of main routes, and of key locations such as important cross-roads, shopping centres, or other public gathering places;
- c) maintaining a clear distinction between private and public space, and ensuring the provision of active building frontages, particularly at ground floor level in appropriate locations, and the incorporation of doors and windows to provide physical and visual links between buildings and the public domain;
- d) preserving and creating those aspects of architecture and urban form which contribute to local distinctiveness and character such as plot widths, building lines, roofscape and open space.

#### CD90

7.1.2 To prepare planning briefs and guidelines for important potential development sites and in considering proposals to have regard to the adopted briefs and guidelines.

#### MI1

7.1.3 Where appropriate, the Council will negotiate planning obligations in order to ensure satisfactory developments.

#### H15

7.1.4 To require a substantial proportion of housing to be provided on those sites to which this policy applies as identified in the Schedule of Major Development Sites and shown on the Proposals Map.

#### H23

7.1.5 To negotiate the provision and retention of a significant proportion of affordable housing where indicated in the Schedule of Major Development Sites.

#### E3

7.1.6 Normally to resist the loss of small business units of 100m<sup>2</sup> or less above or below ground floor level within Principal Shopping Centres.

## 7.2 Options

Symbol	Likely effect against the SA Objective
++	Very beneficial
+	Beneficial
0	None
?	Uncertain or insufficient information on which to determine
X	Negative
XX	Major Negative

Issue 1: Adoption of SPD		
A SPD should seek to improve on the situation that would exist if the SPD were not to be adopted. As a result, the best practice approach to SA includes the appraisal of the likely impacts of adopting and not adopting the SPD.		
SA Objectives	Do not adopt SPD (business as usual)	Adopt SPD
1. To conserve and enhance the natural environment and biodiversity.	<p><b>?</b></p> <p>Development of the sites individually which would be likely to occur without the SPD may have impacts on the natural environment and biodiversity. Impacts would be determined by the nature of proposals for each site.</p>	<p><b>+</b></p> <p>The SPD sets requirements for Open Space Provision and Sustainable Construction and design. As such there may be incidental benefits for biodiversity and the natural environment.</p> <p>The SPD should strengthen its position in line with national guidance to include requirements to enhance biodiversity on and around the site. Given the number of trees present there may well be potential for breeding birds and bats.</p>
2. Reduce crime and anti-social behaviour and the fear of crime.	<p><b>0</b></p> <p>Development is anticipated to follow the requirements of the Designing Out Crime SPD which should ensure significant impacts on this objective are avoided.</p>	<p><b>+</b></p> <p>The SPD includes requirements for crime and security</p> <p>The SPD could include reference to the Designing Out Crime SPD to strengthen requirements for high standards of security and crime prevention.</p>

<p>3. To support a diverse and vibrant local economy to foster sustainable economic growth.</p>	<p><b>X</b> Without the SPD, there is a risk that the four sites are taken forward independently. This may result in a lack of joined up development, creating reduced economic efficiencies and an unsustainable community/development.</p>	<p><b>++</b> The SPD contributes to this Objective in two ways, firstly, through a integrated approach to all four sites, economies of scale can be achieved in addition to more overall floor space. Secondly, it is proposed to have a mixed use development, including retail. Thought should be taken on the provision of office space, as the existing use sets a precedence for this and will also need to be replaced.</p>
<p>4. Encourage social inclusion, equity, the promotion of equality and a respect for diversity.</p>	<p><b>?</b> Development of the sites individually which would be likely to occur without the SPD may have impacts on social inclusion. Impacts would be determined by the nature of proposals for each site.</p>	<p><b>0</b> The SPD does not make any explicit reference to social inclusion and equity. The SPD could reference the Access Design Guide SPD to help ensure requirements for people with special mobility needs are incorporated into the development.</p>
<p>5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables.</p>	<p><b>?</b> Without the SPD, there is a risk that the four sites are taken forward independently. On-site energy generation and inclusion of other energy efficiency measures may not be feasible for individual developments. This could have negative impacts on this objective. However, impacts on climate change would depend on the nature of proposals for each site.</p>	<p><b>++</b> The SPD has strong requirements for energy efficiency and reducing emissions. The SPD identifies the site to be suitable for a 'model eco-development'. The SPD could require the achievement of a <u>six star</u> rating under the Code for Sustainable Homes. The SPD can be further strengthened by the addition of requirements for reuse of demolition materials.</p>
<p>6. Reduce the risk of flooding to current and future residents</p>	<p><b>?</b> Some parts of the different sites lie within a flood zone. As a result there could be issues of flood risk and a flood risk assessment is likely to be required. Development of the sites individually could mean that opportunities for flood attenuation and water drainage may be limited.</p>	<p><b>?</b> The proposed development lies within RBKC's tidal floodplain. Including reference to tidal flood risk in the area, and requiring contact with the Environment Agency should strengthen the SPD. Furthermore, it is recommended to reference the sequential and exemption testing required under PPS 25: Development and Flood Risk.</p>

<p>7. Improve air quality in the Royal Borough.</p>	<p><b>?</b> The entirety of the Borough has been declared an Air Quality Management Area for NOx and PM<sub>10</sub>. In addition, the roads that bound the site to the east and north are heavily used. As a result the development of the sites could lead to increased traffic, which could have negative impacts on air quality. However, impacts will be determined by the requirements for each development with regards parking and cycling provisions.</p>	<p><b>+</b> The entirety of the Borough has been declared an Air Quality Management Area for NOx and PM<sub>10</sub>. With this in mind there is a requirement for a lower level of parking provision than the maximum in the UDP and provision of cycling facilities in the SPD. The SPD could include encouragement for Car Share schemes.</p>
<p>8. Protect and enhance the Royal Borough's parks and open spaces</p>	<p><b>?</b> The site is in an area of Open Space deficiency. Impacts on open space provision will depend on the proposals for each site that come forward. It maybe that it will be less feasible to include a larger area of open space on each of the sites.</p>	<p><b>+</b> The site is in an area of Open Space deficiency. The SPD includes provision under Amenity Space for Open Space. The SPD could be strengthened by using stronger wording in regard to its 'welcoming' of public open space. Could be replaced with 'required' or 'preferred'.</p>
<p>9. Reduce pollution of air, water and land.</p>	<p><b>?</b> Impacts will depend on the requirements developers of each site must meet.</p>	<p><b>+</b> The SPD as a whole performs well with regard to this Objective, however, taking on board the recommendations in this SA could create a stronger positive effect.</p>
<p>9a Prioritise development on previously developed land</p>	<p><b>++</b> The site is on previously developed land.</p>	<p><b>++</b> The site is on previously developed land.</p>
<p>10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic.</p>	<p><b>?</b> Impacts on traffic and transport will depend on the requirements of the Council for each of the sites developed. Development of individual sites may reduce possibilities for Car Share Schemes or other measures that require a larger scale/number of residential units.</p>	<p><b>+</b> The SPD requires a lower provision of car parking and high proportion of cycle provision. The SPD can be strengthened with more emphasis on alternative transport, such as provision of Share Car schemes.</p>

<p>11. Reduce the amount of waste produced and maximise the amount of waste that is recycled.</p>	<p>?</p> <p>Impacts on waste generation will depend on the requirements of the Council for each of the sites developed. Demolition of buildings and new development is also likely to increase waste produced.</p>	<p>+</p> <p>The SPD provides for waste management on site and for small scale on –site waste reduction plant.</p> <p>The SPD could be strengthened through the addition of reuse of demolition and building waste in addition to the consideration of community waste disposal.</p>
<p>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.</p>	<p>?</p> <p>Impacts will depend on the requirements of the Council for development of each of the sites. Development of sites individually may mean opportunities for provision of larger facilities that meet local needs may be lost.</p>	<p>++</p> <p>The SPD provides for a school, play area and other community facilities as a component of the development</p>
<p>13. To aim that the housing needs of the Royal Borough's residents are met</p>	<p>?</p> <p>Impacts will depend on the requirements of the Council for each of the sites. Developments are anticipated to include affordable units.</p>	<p>++</p> <p>Implicitly positive on the proviso that the affordable housing element of the development is in line with the London Plan and the needs of the Borough.</p>
<p>14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials.</p>	<p>?</p> <p>Impacts will depend on the requirements of the Council for each of the developments. Development of sites individually may mean opportunities for on-site energy generation and renewable technologies may not be viable.</p>	<p>+</p> <p>Implicit in the requirements for an energy efficient building but should make more emphasise on the reuse of demolition materials due to the significant amount of built aspects currently on the site.</p>
<p>15. Ensure the provision of accessible health care for all Borough residents.</p>	<p>?</p> <p>Provision of health care facilities will depend on the requirements of the Council for development of the site.</p>	<p>+</p> <p>The SPD provides guidance for the inclusion of a new doctor's surgery, in line with PCT requirements.</p>

<p>16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage.</p>	<p>?</p> <p>Impacts on local distinctiveness are uncertain as they will depend on the extent to which development of each site is designed to complement each other in addition to the surrounding area.</p>	<p>?</p> <p>The area is outside a conservation area and there are no listed buildings in the curtilage or immediate area of the site. However, the development will need to be sympathetic to the nature of the Borough and in keeping with it's vision and aspirations.</p>
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**Issue 2: Preferred use of the site**

The sites are outside a designated town centre location. Therefore the sequential test will apply and obviously Kensington High Street, being the nearest Principal Shopping Centre would be the preferred choice for retail, leisure and entertainment facilities, offices, culture and tourism uses as reflected in paragraph 1.8 of PPS6.

In terms of residential the housing target set out in the London Plan is 3,500 net additional homes to be delivered between 2007/8 and 2016/17. This figure was derived from the GLA's 2004 Housing Capacity Study and to achieve this the Warwick Road sites will need to come forward for residential development. There is also an affordable housing target of 1000 units to be delivered over the period 2007-2017.

Therefore, the preferred use of the site has been identified as residential-led. However, both options are to be appraised to identify the likely impacts of their implementation on sustainability.

SA Objectives	Residential led	Dominance of other uses.
1. To conserve and enhance the natural environment and biodiversity.	+ Provision of open space and other wildlife features, as set out in the SPD, should have a positive impact on this objective.	? Impacts will depend on the level of open space provided within the development, protection of the West London Line and District Line SNCI and trees on and around the site.
2. Reduce crime and anti-social behaviour and the fear of crime.	0 Implementation of provisions for minimising crime through design included both in the SPD and the Designing Out Crime SPD should ensure impacts on crime are not significant.	0 Implementation of provisions for minimising crime through design included both in the SPD and the Designing Out Crime SPD should ensure impacts on crime are not significant.
3. To support a diverse and vibrant local economy to foster sustainable economic growth.	+ Provision of homes, both open market and affordable will enable the support of the Borough's economy.	?/++ Dominance of economic uses should have positive impacts on this objective. Impacts of other uses will depend on the type and layout of those uses.

4. Encourage social inclusion, equity, the promotion of equality and a respect for diversity.	+ Encouraging a diverse range of housing and tenure mixes will result in positive effects on this objective.	? Encouraging a diverse range of other uses will result in positive effects on this objective.
5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables.	? Currently the SPD has a good amount of mitigative guidance to offset any adverse impacts of developing residential use on this site.	? Impacts will depend the nature of other uses. Uses that encourage in-commuting may have negative impacts on climate change, should they lead to increased car use.
6. Reduce the risk of flooding to current and future residents	? Due to parts of the site being in a flood risk zone, residential use may not be the most appropriate. However, as the flood zones do not take flood defences into consideration, residential use of the site may be acceptable. Further assessment is required.	? Some of the site is located within a flood risk zone and as a result it is likely that a flood risk assessment will be required. Impacts on run-off will depend on the nature of other uses.
7. Improve air quality in the Royal Borough.	See findings for Objective 5.	? Impacts will depend on the nature of other uses.
8. Protect and enhance the Royal Borough's parks and open spaces	+ Inclusion of open space is included in the SPD which should help cater for residents' needs.	X Dependant on use but no doubt would perform poorly in relation to residential development due to lack of incentive for the users of the site to develop open space.

<p>9. Reduce pollution of air, water and land.</p>	<p>+</p> <p>Remediation of any land contamination on a fit for use basis will create less land contamination and less chance for leachate. The SPD also includes provisions for flood attenuation.</p>	<p>?</p> <p>Impacts will depend on the uses of the site. Remediation of any land contamination on a fit for use basis will create less land contamination and less chance for leachate but not as much as for residential use.</p>
<p>9a Prioritise development on previously developed land</p>	<p>++</p> <p>The site is on previously developed land.</p>	<p>++</p> <p>The site is on previously developed land.</p>
<p>10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic.</p>	<p>?</p> <p>Residential use may increase traffic but the provisions of the SPD should help ensure that negative impacts on this objective are minimised.</p>	<p>?</p> <p>Dependant on use (factory/office/warehouses etc). Uses of the site which lead to increased traffic could have negative impacts on this development.</p>
<p>11. Reduce the amount of waste produced and maximise the amount of waste that is recycled.</p>	<p>?</p> <p>The SPD includes provisions for waste management, which should help ensure negative impacts on this objective are minimised. Nonetheless, residential use may lead to increased waste arisings.</p>	<p>?</p> <p>This will depend on the use of the site.</p>
<p>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.</p>	<p>?</p> <p>Provisions in the SPD for social and community facilities on the site should help ensure that local needs are met. However, impacts will depend on implementation of the SPD in practice.</p>	<p>?</p> <p>This will depend on the use of the site.</p>
<p>13. To aim that the housing needs of the Royal Borough's residents are met</p>	<p>++</p> <p>Provision of homes, both open market and affordable, should meet the housing needs in the Borough.</p>	<p>X</p> <p>Dominance of other uses may have negative impacts on this objective and may lead to a failure in meeting housing targets outlined in the London Plan.</p>

<p>14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials.</p>	<p>?</p> <p>The SPD includes provisions for on-site energy generation and energy efficiency measures. This should have positive impacts but will depend on implementation.</p>	<p>?</p> <p>This will depend on the use of the site.</p>
<p>15. Ensure the provision of accessible health care for all Borough residents.</p>	<p>?</p> <p>The SPD includes provisions for health care facilities which should mean the needs of local and new residents are met. However, impacts will be determined by the implementation of the SPD.</p>	<p>?</p> <p>This will depend on the use of the site.</p>
<p>16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage.</p>	<p>?</p> <p>Impacts will depend on the design and layout of the new development.</p>	<p>?</p> <p>Impacts will depend on the design and layout of the new development.</p>

<b>Issue 3: Scope of SPD</b> The draft SPD contains detailed requirements for the development of the site within the context of a residential-led development. The Council can either insist that all requirements included within the draft are included in development proposals for the site or can require a selection of options to be included.		
SA Objectives	Option A: All requirements in current draft (options 4a – 4g)	Option B: Selection of requirements
1. To conserve and enhance the natural environment and biodiversity.	+ Inclusion of a buffer zone adjacent to the West London Line SNCI (an area of biodiversity value), native species and the potential for a small wildlife pond and green or brown roofs should have a positive impact on this objective.	? Effects are uncertain as they will depend on the preferred selection of options.
2. Reduce crime and anti-social behaviour and the fear of crime.	+ The SPD includes measures for high standards of crime prevention and security. This should ensure the development has positive impacts on this objective.	0 Assuming the requirements of the Designing Out Crime SPD are implemented, significant impacts should not occur.
3. To support a diverse and vibrant local economy to foster sustainable economic growth.	+ The SPD includes provision for small retail units, small-scale cafes and restaurants, potentially a replacement for the Radnor Arms and a private fitness club. The SPD also provides for the retention of Homebase and for the provision of affordable residential units. These features should all have positive impacts on the local economy.	? Effects are uncertain as they will depend on the preferred selection of options.

<p>4. Encourage social inclusion, equity, the promotion of equality and a respect for diversity.</p>	<p>+</p> <p>Provision of affordable housing, social and community facilities should have positive impacts on this objective.</p>	<p>?</p> <p>Impacts on this objective will depend on the preferred selection of options and on the nature of the development i.e. design &amp; layout and incorporation of social/community facilities.</p>
<p>5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables.</p>	<p>+</p> <p>The targets and aspirations included in the SPD with respect to increased energy efficiency and use of renewable energy should have a positive impact on this objective. In addition, inclusion of green transport features should have a positive impact.</p>	<p>?</p> <p>Impacts on this objective will depend on the preferred selection of options and whether features encouraging energy efficiency and green transport measures will be included in the development.</p>
<p>6. Reduce the risk of flooding to current and future residents</p>	<p>?</p> <p>The provisions for flood attenuation in the SPD should have positive impacts on this objective. However the parts of the site are in a flood risk zone which means a flood risk assessment is likely to be required.</p>	<p>?</p> <p>Parts of the site are in a flood risk zone which means a flood risk assessment is likely to be required. If required, this will not be an option for the SPD. The impacts on this objective will depend on whether flood attenuation measures are included in the development, which will depend on the preferred selection of options.</p>
<p>7. Improve air quality in the Royal Borough.</p>	<p>?</p> <p>Inclusion of air quality measures and encouragements for green travel should have positive impacts on air quality. However, traffic levels are likely to increase as a result of the development, despite the development being permit free, particularly during construction.</p>	<p>?</p> <p>The impacts of this Option on SA Objective 7 will depend on the preferred selection of options. implemented. There is the potential for negative impacts on air quality both from construction dust and increases in traffic. Moreover, the whole of the Borough is an AQMA.</p>

<p>8. Protect and enhance the Royal Borough's parks and open spaces</p>	<p>++ There will be open space provided on the site which is not currently on the site at present.</p>	<p>? Effects are uncertain as they will depend on the preferred selection of options. The site is in an area of open space deficiency so it will be important to provide open space on the site.</p>
<p>9. Reduce pollution of air, water and land.</p>	<p>0 The SPD includes provisions for assessment and remediation of any contaminated land on the site and for flood attenuation. This should help ensure that there are no negative impacts on this objective.</p>	<p>? Impacts on this objective will depend on the preferred selection of options.</p>
<p>9a Prioritise development on previously developed land</p>	<p>++ The site is on previously developed land</p>	<p>++ The site is on previously developed land</p>
<p>10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic.</p>	<p>+ The SPD includes measures for green transport and for minimising impacts on traffic. This should have positive impacts on this objective.</p>	<p>? Impacts on this objective will depend on the preferred selection of options. Owing to the site size there is considerable potential for increased traffic to result from the development if measures to encourage alternative modes are not included in the development.</p>
<p>11. Reduce the amount of waste produced and maximise the amount of waste that is recycled.</p>	<p>? Encouragements for on-site waste reduction plan and for recycling facilities to be provided should have positive impacts on this objective. However, there are likely to be large volumes of demolition wastes generated from the development and the residential units may lead to an overall increase in waste generation from the site.</p>	<p>? Impacts on this objective will depend on the preferred selection of options. There is the potential for significant increases in waste arisings during demolition/ construction and potentially also operation of the development.</p>

<p>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.</p>	<p>++ The SPD encourages the provision of amenity space, education and social facilities. This should have positive impacts on this objective.</p>	<p>? Impacts on this objective will depend on the preferred selection of options.</p>
<p>13. To aim that the housing needs of the Royal Borough's residents are met</p>	<p>++ The SPD includes provision for affordable and market housing to be provided on the site. This should have positive impacts on meeting the Boroughs housing needs and provision requirements.</p>	<p>? There are likely to be positive impacts on this objective but this will depend on the level of affordable housing provision on the site. This will be dependent on the preferred selection of options.</p>
<p>14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials.</p>	<p>? There could be positive impacts on energy efficiency through the target of 20% of the development's operational energy requirements being sought by on-site energy generation and other measures to increase energy efficiency. However demolition of buildings could lead to negative impacts on this objective.</p>	<p>? This will depend on the preferred selection of options, for example on whether energy efficiency measures would be included.</p>
<p>15. Ensure the provision of accessible health care for all Borough residents.</p>	<p>++ The SPD seeks a GP surgery to be located on the site which should help ensure accessible health care for residents in the surrounding area and for future residents on the site.</p>	<p>? Impacts on this objective will depend on the preferred selection of options.</p>

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<p>16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage.</p>	<p>++ The SPD includes requirements for maintaining the cultural heritage of the area, for legibility, for public art and amenity space. These features should all have positive impacts on this objective.</p>	<p>? Impacts on this objective will depend on the preferred selection of options.</p>
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**Issue 4: Selection of requirements included in the SPD**

The Options a-g below include the current requirements of the SPD. However, these features are to be appraised in order to evaluate the likely effects on sustainability of each should Option 3b be selected. The effects of the combination of options selected will be appraised upon finalisation of the draft SPD.

SA Objectives	Option A: Affordable Housing	Option B: Educational facilities	Option C: Health Care facilities	Option D: Amenity Space	Option E: Retail/Comm ercial units	Option F: Sustainable Transport	Option G: Sustainable construction and design.
1. To conserve and enhance the natural environment and biodiversity.	0	0	0	++ Provision of amenity space, a buffer for wildlife adjacent to the West London line SNCI and potentially a small wildlife pond should have positive impacts.	0	0	++ Inclusion of green/brown roofs should have a positive impact.

<p>2. Reduce crime and anti-social behaviour and the fear of crime.</p>	<p>? Impacts will depend on the inclusion of designing out crime measures included in the SPD and the Designing Out Crime DPD.</p>	<p>? Impacts will depend on the inclusion of designing out crime measures included in the SPD and the Designing Out Crime DPD.</p>	<p>? Impacts will depend on the inclusion of designing out crime measures included in the SPD and the Designing Out Crime DPD.</p>	<p>? Impacts will depend on the inclusion of designing out crime measures included in the SPD and the Designing Out Crime DPD.</p>	<p>? Impacts will depend on the inclusion of designing out crime measures included in the SPD and the Designing Out Crime DPD.</p>	<p>? Impacts will depend on the inclusion of designing out crime measures included in the SPD and the Designing Out Crime DPD.</p>	<p>? Impacts will depend on the inclusion of designing out crime measures included in the SPD and the Designing Out Crime DPD.</p>
<p>3. To support a diverse and vibrant local economy to foster sustainable economic growth.</p>	<p>+ Ensuring affordable housing is available should encourage people to want to live and work in the area.</p>	<p>? Ensuring education facilities are available should encourage people to want to live and work in the area.</p>	<p>? Ensuring health care facilities are available should encourage people to want to live and work in the area.</p>	<p>? Ensuring a high quality environment should encourage people to want to live and work in the area.</p>	<p>++ Provision of units for retail or commercial uses should help encourage businesses to locate in the area.</p>	<p>0</p>	<p>0</p>

<p>4. Encourage social inclusion, equity, the promotion of equality and a respect for diversity.</p>	<p>++ Provision of affordable housing should have positive impacts on social inclusion.</p>	<p>+ Provision of educational facilities to meet the needs of future residents and those in the surrounding area should have positive impacts for social inclusion.</p>	<p>+ Provision of health care facilities to meet the needs of future residents and those in the surrounding area should have positive impacts for social inclusion.</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>0</p>
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<p>5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables.</p>	<p>0</p>	<p>?</p> <p>Provision of educational facilities could lead to increase traffic which could increase greenhouse gas emissions. This could have negative impacts on this objective. However, impacts will be determined by inclusion of sustainable transport measures.</p>	<p>?</p> <p>Provision of health care facilities could lead to increase traffic which could increase greenhouse gas emissions. This could have negative impacts on this objective. However, impacts will be determined by inclusion of sustainable transport measures.</p>	<p>0</p>	<p>?</p> <p>Provision of retail/ commercial units could lead to increase traffic which could increase greenhouse gas emissions. This could have negative impacts on this objective. However, impacts will be determined by inclusion of sustainable transport measures.</p>	<p>++</p>	<p>++</p>
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<p>6. Reduce the risk of flooding to current and future residents</p>	<p>?</p> <p>Parts of the site are in or close to a flood risk zone. As a result residential uses may not be appropriate for certain areas of the site. It is likely that a flood risk assessment will be required to determine this.</p>	<p>?</p> <p>Parts of the site are in or close to a flood risk zone. As a result educational uses may not be appropriate for certain areas of the site. It is likely that a flood risk assessment will be required to determine this.</p>	<p>?</p> <p>Parts of the site are in or close to a flood risk zone. As a result health care uses may not be appropriate for certain areas of the site. It is likely that a flood risk assessment will be required to determine this.</p>	<p>?</p> <p>Parts of the site are in or close to a flood risk zone. As a result amenity space may be a suitable use of parts of the site to reduce the risk of flooding for residents.</p>	<p>?</p> <p>Parts of the site are in or close to a flood risk zone. As a result retail/commercial uses may not be appropriate for certain areas of the site. It is likely that a flood risk assessment will be required to determine this.</p>	<p>0</p>	<p>++</p> <p>Inclusion of flood mitigation measures should have a positive impact on this objective.</p>
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<p>7. Improve air quality in the Royal Borough.</p>	<p>0 Inclusion of 'affordable' units as opposed to purely market units is not likely to impact on emissions e.g. from traffic.</p>	<p>? Inclusion of educational facilities on the site could lead to increased traffic, which could have negative impacts on air quality. However, impacts will depend on whether sustainable transportation measures are included.</p>	<p>? Inclusion of educational facilities on the site could lead to increased traffic, which could have negative impacts on air quality. However, impacts will depend on whether sustainable transportation measures are included.</p>	<p>0 There are unlikely to be significant impacts on air quality from provision of amenity space but, nonetheless, positive impacts could still occur.</p>	<p>? Inclusion of educational facilities on the site could lead to increased traffic, which could have negative impacts on air quality. However, impacts will depend on whether sustainable transportation measures are included.</p>	<p>++ Inclusion of measures to reduce car use and to encourage more sustainable modes of transport should have positive impacts on this objective.</p>	<p>0</p>
<p>8. Protect and enhance the Royal Borough's parks and open spaces</p>	<p>0</p>	<p>? Should provision of educational facilities mean amenity space is not provided on the site there could be negative impacts on this objective.</p>	<p>? Should provision of health care facilities mean amenity space is not provided on the site there could be negative impacts on this objective.</p>	<p>++ Provision of amenity space should have a significant positive effect on this objective.</p>	<p>0</p>	<p>0</p>	<p>0</p>

<p>9. Reduce pollution of air, water and land.</p>	<p>0 Inclusion of 'affordable' units as opposed to purely market units is not likely to impact on pollution to air, land or water.</p>	<p>? Inclusion of educational facilities on the site could lead to increased traffic, which could increase air pollution. However, impacts will depend on whether sustainable transportation measures are included.</p>	<p>? Inclusion of health care facilities on the site could lead to increased traffic, which could increase air pollution. However, impacts will depend on whether sustainable transportation measures are included.</p>	<p>0</p>	<p>? Inclusion of retail/commercial facilities on the site could lead to increased traffic, which could increase air pollution. However, impacts will depend on whether sustainable transportation measures are included.</p>	<p>+ Sustainable transport measures should help ensure emissions from traffic associated with the site are minimised.</p>	<p>++ Inclusion of features for flood attenuation, reduced fossil fuel use and for remediation of land contamination should have positive impacts on this objective.</p>
<p>9a Prioritise development on previously developed land</p>	<p>++ Development is on previously developed land.</p>	<p>++ Development is on previously developed land.</p>	<p>++ Development is on previously developed land.</p>	<p>++ Development is on previously developed land.</p>	<p>++ Development is on previously developed land.</p>	<p>++ Development is on previously developed land.</p>	<p>++ Development is on previously developed land.</p>

<p>10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic.</p>	<p>0 Inclusion of 'affordable' units as opposed to purely market units is not likely to impact on traffic.</p>	<p>? Provision of educational facilities could lead to an increase in traffic. However, impacts will be determined by whether sustainable transport measures/reduced car parking are also provided.</p>	<p>? Provision of educational facilities could lead to an increase in traffic. However, impacts will be determined by whether sustainable transport measures/reduced car parking are also provided.</p>	<p>0</p>	<p>? Provision of retail/commercial units could lead to an increase in traffic. However, impacts will be determined by whether sustainable transport measures/reduced car parking are also provided.</p>	<p>++ Inclusion of sustainable transport features and reduced car parking provision should have positive impacts on this objective.</p>	<p>0</p>
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<p>11. Reduce the amount of waste produced and maximise the amount of waste that is recycled.</p>	<p>0 Inclusion of 'affordable' units as opposed to purely market units is not likely to impact on waste generation. Although provision of residential units may increase waste generation on the site. Impacts may be reduced through incorporation of recycling facilities etc as set out in the SPD.</p>	<p>? Provision of educational facilities could increase the amount of waste produced on the site. Impacts may be reduced through incorporation of recycling facilities etc as set out in the SPD.</p>	<p>? Provision of health care facilities could increase the amount of waste produced on the site. Impacts may be reduced through incorporation of recycling facilities etc as set out in the SPD.</p>	<p>0</p>	<p>? Provision of retail/commercial facilities could increase the amount of waste produced on the site. Impacts may be reduced through incorporation of recycling facilities etc as set out in the SPD.</p>	<p>0</p>	<p>? Inclusion of waste minimisation plant on site and recycling facilities should have positive impacts on this objective. However, there is also likely to be significant volume of waste arising from demolition on the site.</p>
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<p>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.</p>	<p>0</p>	<p>++ Provision of educational facilities should have a significant positive effect on this objective.</p>	<p>++ Provision of health care facilities should have a significant positive effect on this objective.</p>	<p>++ Provision of amenity space should have a significant positive effect on this objective.</p>	<p>? Unlikely to be a significant impact provided provision of retail and commercial units is not at the expense of education/health care facilities.</p>	<p>0</p>	<p>0</p>
<p>13. To aim that the housing needs of the Royal Borough's residents are met</p>	<p>++ Provision of affordable housing should have significant positive effects on this objective.</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>0</p>
<p>14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials.</p>	<p>? Impacts will depend on whether energy efficiency measures are included in the development.</p>	<p>? Impacts will depend on whether energy efficiency measures are included in the development.</p>	<p>? Impacts will depend on whether energy efficiency measures are included in the development.</p>	<p>0</p>	<p>? Impacts will depend on whether energy efficiency measures are included in the development.</p>	<p>0</p>	<p>++ Inclusion of sustainable design features such as on-site energy generation etc. should have positive effects on this objective.</p>

<p>15. Ensure the provision of accessible health care for all Borough residents.</p>	<p>0</p>	<p>?</p> <p>Should education facilities be provided instead of health care facilities there could be a negative impact on this objective.</p>	<p>++</p> <p>Provision of a GP surgery should have significant positive effects on this objective.</p>	<p>0</p>	<p>?</p> <p>Should retail/commercial units be provided instead of health care facilities there could be a negative impact on this objective.</p>	<p>0</p>	<p>0</p>
<p>16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage.</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>+</p> <p>Provision of amenity space should help improve the local environmental quality and amenity.</p>	<p>0</p>	<p>0</p>	<p>?</p> <p>Impacts will be determined by the designs for the development.</p>

