



Proposed Submission Core Strategy for the Royal Borough of Kensington and Chelsea with a focus on North Kensington

Sustainability Appraisal Report: Non Technical Summary

Prepared for the Royal Borough of Kensington and Chelsea



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Royal Borough of Kensington and Chelsea

Sustainability Appraisal of the *Proposed Submission Core Strategy for the Royal Borough of Kensington and Chelsea with a focus on North Kensington*

Revision Schedule

Proposed Submission Core Strategy for the Royal Borough of Kensington and Chelsea with a focus on North Kensington SA Report

October 2009

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Non Technical Summary

The Purpose of this Report

This report summarises the results of the Sustainability Appraisal (SA) of the **Proposed Submission Core Strategy for the Royal Borough of Kensington and Chelsea with a focus on North Kensington** (the 'Core Strategy'). It describes the main sustainable development issues for the Borough as well as provides a brief introduction to the SA process to date.

The overall aim of the SA is to ensure that the policies and proposals contained within the Core Strategy contribute to sustainable development. In order to achieve this, the Core Strategy is subject to SA, a process which considers the environmental, social and economic impacts of the plan. SA is a statutory obligation under the Planning and Compulsory Purchase Act 2004.

Introduction

The Royal Borough of Kensington and Chelsea has reached the pre-submission stage in the development of its Core Strategy. The Borough's Core Strategy is one of several documents which combined make up the Borough's statutory spatial development plan - the Local Development Framework (LDF). The Core Strategy is a Development Plan Document (DPD), which once adopted, will set out the Borough's future development over the next 20 years. It will be used to identify and propose development of strategic importance to the Borough and will set the framework to which other documents contained in the LDF must conform.

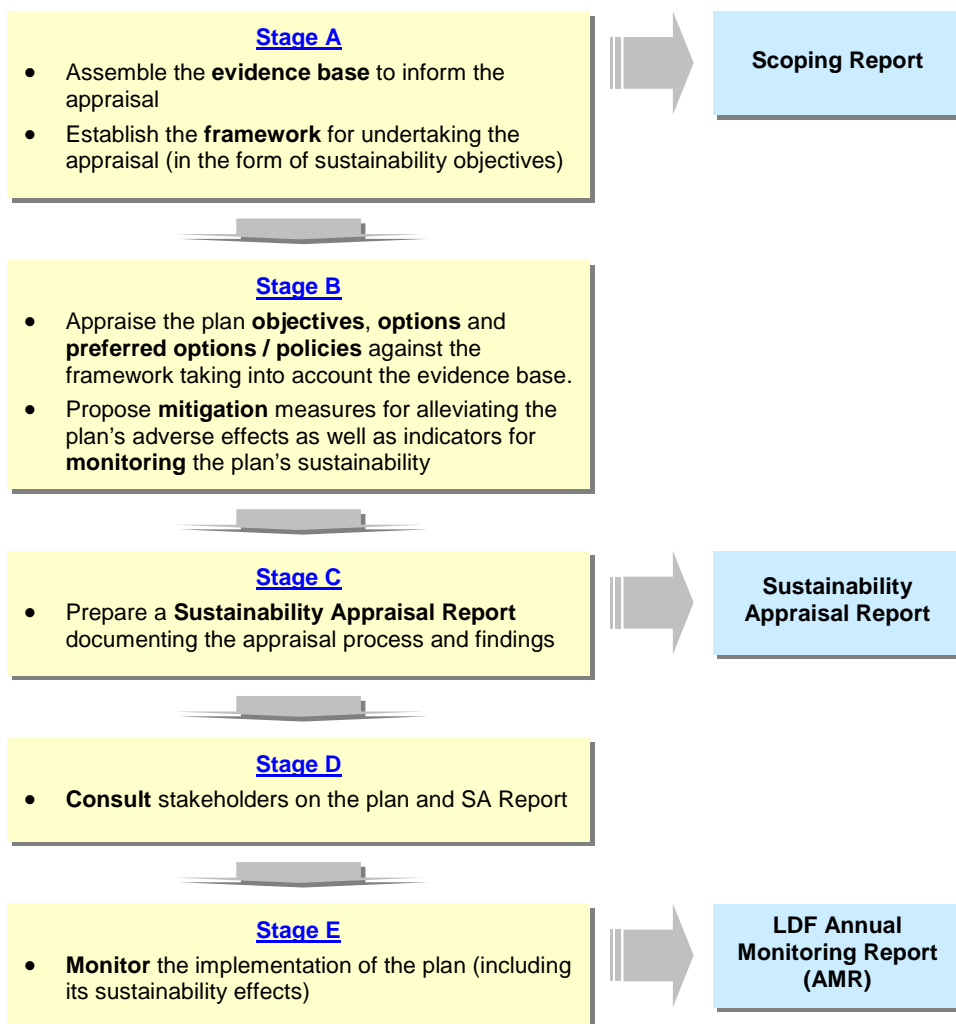
Sustainability Appraisal

This Report represents the output of the SA of the Core Strategy, and incorporates Strategic Environmental Assessment (SEA).

SEA involves the methodical identification and evaluation of the *environmental* impacts of a 'strategic action', for example a plan or programme such as the Core Strategy. In 2001, the European Union legislated for SEA and adopted Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive'). The Directive entered into force in the UK on 21 July 2004.

The Government's approach to the SEA Directive has been to incorporate its requirements into a wider SA process that considers *economic* and *social* effects alongside environmental effects. The combined SEA/SA process is referred to in this document as 'Sustainability Appraisal' or 'SA'. The process is documented in guidance published by government which advocates a five-stage approach to undertaking SA (see below) and this approach has been applied in this process. For more information on each stage, please refer to the main SA Report.

Five stage approach to SA



Stage A of the process – Scoping – was initially undertaken in 2005 and was documented in the Sustainability Appraisal Scoping Report¹. The Scoping Report established the context in which the LDF was being prepared, i.e. the other policies, plans, programmes, strategies and initiatives that could influence the content of the LDF (and vice-versa) as well as the sustainability opportunities and challenges they present. An SA Update Report² was prepared in February 2009 which incorporated the additional policy context, evidence base and SA process for the Core Strategy since 2005.

The SA Update Report also presented the trends in key baseline indicators since 2005. The analysis showed a general improvement in performance compared to 2005 however, three indicators were shown

¹ Scott Wilson (2005) Strategic Environmental Assessment / Sustainability Appraisal of the Royal Borough of Kensington and Chelsea Local Development Framework: Vol. 1 – Scoping Report. Available [online] at http://www.rbkc.gov.uk/pdf/rbkc_vol_1_scoping_report.pdf?bcsi_scan_F6892CABA15785B4=0&bcsi_scan_filename=rbkc_vol_1_scoping_report.pdf accessed 8/10/09.

² A Sustainability Appraisal Update Report was prepared in 2009 identifying additional policy and evidence base since 2005 as well as identified how the SA so far had influenced the preparation of the plan. This was a non statutory report prepared to inform statutory consultees and stakeholders of the SA process that had occurred to date.

to have deteriorated in performance. These were indicators relating to three SA objectives: biodiversity, crime and housing. A summary of Stage A is included below, however, for further information please see the Sustainability Appraisal Scoping Report (2005), SA Update Report (2009) and the main SA Report.

The main SA Report documents Stage B of the process and in doing so also satisfies the requirements of Stage C. Stage B of the SA process involves the main body of appraisal work and consists of 6 key tasks:

- B1 – Testing the Plan Objectives against the SA Framework;
- B2 – Developing and Refining Options;
- B3 – Predicting the effects;
- B4 – Evaluating the Effects
- B5 – Identifying mitigation measures; and
- B6 – Developing monitoring proposals.

Stage D involves consulting on the Core Strategy together with this Report and Stage E concerns monitoring the effects of the plan.

Stage A Findings

What's the policy context?

The London Plan sets out the Spatial Development Strategy for London with which all London Borough's development plans must be in 'general conformity'. In other words, it provides the London-wide context for all boroughs when developing their local planning policies, such as those within the Royal Borough of Kensington and Chelsea's Core Strategy. London Plan policies identified as most relevant to the Core Strategy include: Policy 2A.7 which identifies North Kensington as an area for regeneration; Policy 3A.2 which sets the expected targets for housing delivery; Policy 3D.4 which aims to protect and enhance Strategic Cultural Areas such as the South Kensington museums complex; and Policy 5F.1 which identifies the need to promote London's world city role - specifically identifying Knightsbridge and South Kensington museums complex and the need for regeneration in parts of North Kensington.

The Mayor has published the Draft replacement London Plan in October 2009 for consultation. Some of the changes that are relevant to the Borough include:

- The designation of Earl's Court and West Kensington and Kensal Canalside as Opportunity Areas.
- The Borough ten year housing supply target is proposed to increase to 5,850 units between 2011 and 2021 (585 net additional dwellings per annum).
- A greater emphasis on the design quality of new residential development alongside the introduction of minimum space standards.
- The 50% strategic affordable housing target is replaced by a flexible policy which 'seeks to maximise' affordable housing provision with an average target of 13,200 more affordable homes per year in London.

- In terms of planning obligations priority is given to securing affordable housing, Crossrail and other transport improvements.
- Greater flexibility in tackling climate change, proposing that 25% of the heat and power used in London should be generated through the use of decentralised energy systems by 2025.
- A target of zero carbon for all new major residential developments and non – domestic buildings after 2016 and 2019 respectively.

What's the situation now?

The Royal Borough of Kensington and Chelsea (RBKC) is one of the most desirable places to live in London. It benefits from an impressive built environment of grand Georgian and Victorian terraces and Edwardian mansion blocks. Correspondingly, the Borough has over 4,000 listed buildings and approximately 70% of the Borough is within a conservation area. Away from the Borough's 'central belt', however, there are numerous 20th century estate developments, some of which, in contrast to the more wealthy areas of the borough, suffer considerable deprivation. Similarly, the Borough experiences polarised access to good public transport infrastructure with areas around Notting Hill Gate and South Kensington having excellent access compared to areas in the far north-west and south which are not as well served.

Access to public open spaces for large parts of the Borough is limited³, particularly for areas in the far north and across the majority of the southern part, however, this is balanced, in part, by Holland Park and Kensington Gardens. Furthermore, the Borough benefits from rich biodiversity and 24 Sites of Nature Conservation Importance. RBKC also benefits from access to both the River Thames and the Grand Union Canal. Away from the busy thoroughfares, the Borough does have many quieter areas which are conducive to cycling and walking and combined with good transport infrastructure results in a lower than average car ownership.

The whole of the Borough is designated an Air Quality Management Area predominantly due to a combination of domestic gas burning and road traffic emissions. The latter reflects the Borough's central London location and its road network providing a thoroughfare to the West.

In terms of community services and amenities, the Borough is relatively well served. The Borough has adequate primary schools, however there is insufficient supply of secondary school provision to meet demand with over 1 in 5 children of secondary age attending schools outside the Borough. RBKC benefits from good day-to-day shopping facilities as well as larger retail centres such as Kensington High Street and Knightsbridge. The Borough also has numerous smaller markets, but most notably Portobello Market which is world renowned.

Generally speaking, the Borough can be broadly divided into two spatial areas – the north and the rest of the Borough. This spatial difference manifests itself in a range of characteristics including but not limited to distribution of social rented housing, indices of deprivation and correspondingly differences in health and life expectancy between these areas. Access to good public transport infrastructure and local day-to-day services combined with the added difficulty of relatively poor interconnectivity between the north and the rest of the Borough, means that the north continues to be relatively deprived and lacking investment.

³ Classified as areas within 400m of public open space.

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In summary, the following sustainability issues were identified in the 2005 Scoping Report and updated in the SA Update Report 2009:

Topic	Key Sustainability Issues
Environment	• Air quality – the whole Borough is a declared AQMA for both PM10 and NO2
	• Open Space – there is a shortage of open space in the Borough, and a shortage of areas in which to create additional open space
	• Noise and Vibration – complaints have been rising since 2004
	• Traffic – two thirds more parking permits issued than parking spaces
	• Waste – RBKC not meeting recycling targets
	• Decline in the area of sites of nature conservation value and bird populations
Social	• Housing – the availability of low cost, affordable housing
	• Health - shortage of Doctors Surgeries and GPs
	• Education – need for secondary school in the SW of the Borough.
	• Community Facilities – lack of elderly person homes (Care Homes)
	• Crime – Total notifiable offences are declining; however, there have been increases in drug offences
Economy	• Deprivation – some wards amongst the most economically deprived in the country in particular, North Kensington (north of the Westway) and SW Chelsea
	• Shortage of small office units, <300m2 and particularly <100m2
	• Average house prices – Average house prices are the highest in the UK at over £850,000 in 2008, creating a barrier to entry for low and medium level earners

Stage A of the SA process also enables the analysis of how the Borough might look in the absence of the Core Strategy, i.e. the likely future baseline without the plan. This is presented below.

What's the situation without the plan?

The Royal Borough of Kensington and Chelsea is likely to experience continued pressure on land availability to meet the high demand for housing and development. This is likely to place a greater burden on the already limited development land available and if not carefully managed could adversely impact on the local built and natural environment. Without the plan new development is unlikely to be constructed to such high sustainable design and construction standards and hence it may lack design improvements to enable greater flexibility in use, i.e. to meet occupants changing requirements over time, and to help mitigate developments' impacts on climate change.

In terms of the socio-economic conditions the Borough is likely to continue to see the highest house prices in the country with high income earning residents continuing to commute to higher paid jobs outside of the Borough. The economic and socio-economic disparity throughout the Borough, "the north-south divide" could worsen placing additional strain on the supply of housing and community infrastructure in the future. In terms of transport, accessibility to public transport should improve with the proposed London

Underground / Overground stations in Kings Road and Lots Road/World's End, however, without a focus for redevelopment in the north of the Borough it is highly unlikely that a Crossrail station at Kensal could be justified. Furthermore, without specific attention to improving intra-borough connectivity, in particular addressing poor transport accessibility to and from the north of the Borough, existing socio-economic disparities between could be further exacerbated. Correspondingly, retail provision and large scale development is likely to be provided in areas with existing good public transport and road access and hence continue to focus around existing commercial centres.

Without the Core Strategy the clear need for regeneration in specific parts of the Borough may not be realised. For example, although the London Plan - consultation draft replacement plan⁴ - identifies the Kensal Canalside as an Opportunity Area and as an area with significant development potential it is noted that its regeneration is not without its challenges and constraints. The Core Strategy highlighting Kensal as an area of regeneration need and site allocation should help provide a greater impetus to its redevelopment, and in particular may catalyze opinion on the further benefits a Crossrail station would bring to the area. Similarly, education provision could also be impacted without a clear vision for new secondary schools in both the north and south to help address the current lack of places for the Borough's children. Furthermore, without clear visions such as to mitigate the negative influences of physical barriers such as the Westway, and improving and re-provision of housing and social and community infrastructure where most needed, opportunities to increase social inclusion, equality and equity among all Borough residents could be lost.

Sustainability Appraisal Framework

The SA objectives were developed by drawing on the sustainability issues identified and also taking account of other evidence gathered during Stage A. The table below sets out the SA objectives identified for the Royal Borough of Kensington and Chelsea and includes changes made to the SA Framework from the SA Update Report (shown in italics).

⁴ London Plan (2009) The London Plan Spatial Development Strategy for Greater London - Consultation draft replacement plan, available [online] at <http://www.london.gov.uk/shaping-london/london-plan/strategy/download.jsp>, accessed 26/10/09.

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Objectives	
Biodiversity	To conserve and enhance the natural environment and biodiversity
Climate Change	To minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables <i>and adopt measures to adapt to climate change</i>
Flood Risk	To reduce the risk of flooding to current and future residents
Air Quality	To improve air quality in the Royal Borough
Parks & Open Spaces	To protect and enhance the Royal Borough's parks and open spaces
Pollution	To reduce pollution of air, water and land
Previously Developed Land	To prioritise development on previously developed land
Transport	To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic
Waste	To reduce the amount of waste produced and maximise the amount of waste that is recycled
Energy Efficiency	To encourage energy efficiency through building design; maximise the re-use of building's and the recycling of building materials
Cultural Heritage	To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage
Crime	To reduce crime and anti-social behaviour and the fear of crime
Equalities	To encourage social inclusion (<i>including access</i>), equity, the promotion of equality and a respect for diversity
Community Facilities	To ensure that social and community uses and facilities which serve a local need are enhanced, protected, and to encourage the provision of new community facilities
Housing	To aim that the housing needs of the Royal Borough's residents are met
Health	To ensure the provision of accessible health care for all Borough residents
Economic Growth	To support a diverse and vibrant local economy to foster sustainable economic growth

The Core Strategy

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

The **Spatial Strategy** is divided into two parts and sets out what the Borough wants to achieve:

- **Strategic Objectives** – these inform the direction of the Core Strategy and outline how to achieve the Core Strategy's vision
- **Places** – identifies 14 key areas across the Borough which are seen to require particular focus, some of which are planned for considerable change

The **Delivery Strategy** sets out how the Spatial Strategy is to be achieved and is divided into four main parts:

- **Strategic Sites** – these are allocated areas within the Borough which are needed to deliver the Spatial Strategy

- **Policies and Actions** – the Development Management policies add further depth to the delivery of the Strategic Objectives
- **Infrastructure Requirements** – set out for the 14 Places and 7 Strategic Sites
- **Monitoring Framework** – sets out how delivery of the plan will be ensured, particularly if key policies fail.

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

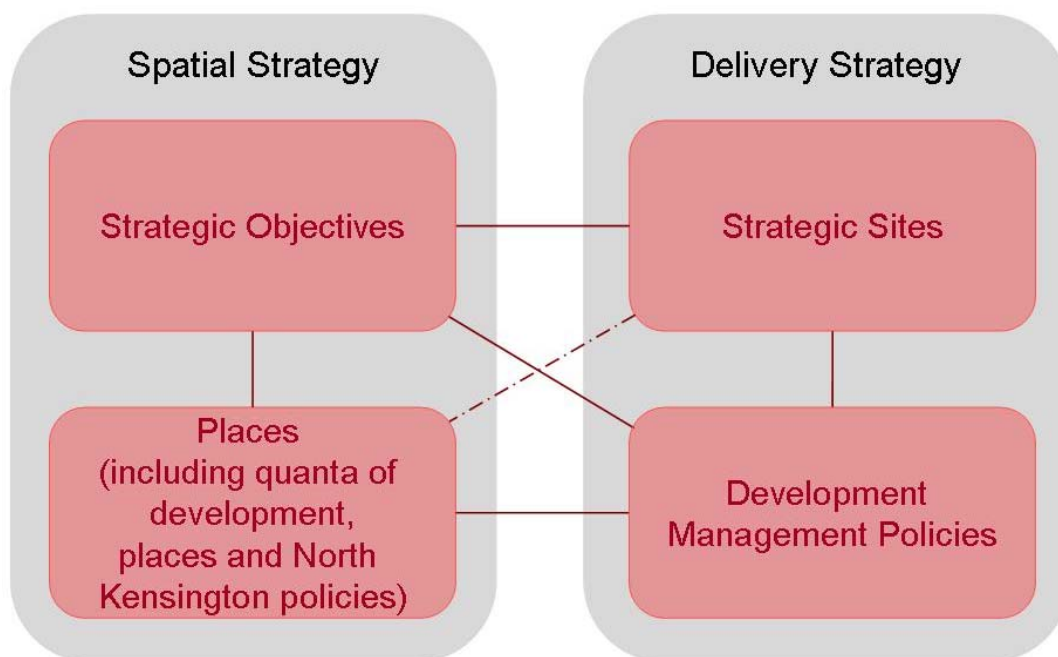
Further detail on what is included in four Core Strategy elements is contained in the table below.

Spatial Strategy	
Strategic Objectives	The Core Strategy identifies seven Strategic Objectives. The Strategic Objectives structure the plan and have been used to inform its direction.
Places (including Spatial Strategy)	Fourteen places have been identified by the Council, even though the Borough comprises more places. The Places selected for the Core Strategy are those where significant change is planned, and include the district, major and international town centres that are the focus of the activity, with the exception of Westway. Westway has been included because of its particular negative impacts that need to be addressed as part of planned regeneration in North Kensington.
Delivery Strategy	
Strategic Sites	The Strategic Sites are sites where great change is envisaged in the Borough. Their development or redevelopment is considered central to achieve the Strategic Objectives and the overall Core Strategy Vision. Eight Strategic Sites have been identified across the Borough, with seven of these allocated in the Core Strategy. The remaining site, Lots Road Power Station has already been granted planning permission and is included for information only.
Development Management Policies	The seven Strategic Objectives are supported by Development Management Policies which will help to achieve the Council's overarching Vision and guide development across the Borough.

Appraisal Findings

This Sustainability Appraisal has been undertaken on the following main elements of the Spatial Strategy and Delivery Strategy: Strategic Objectives, Places, Strategic Sites and Development Management Policies as shown in the figure below.

The likely sustainability impacts of these elements were predicted and the significance of the effects evaluated in terms of each of the SA objectives. The key conclusions from the appraisal are set out below. For a more detailed understanding of the sustainability implications of each element and the Core Strategy as a whole please refer to the main SA report.



As well as identifying and determining the significance of impacts in terms of the SA objectives, the strategic sites appraisal also involved the use of a Geographical Information System (GIS) as the first stage to the appraisal. Twenty four (24) constraint layers were input into the GIS which provided information on the key constraints facing development / redevelopment of the Strategic Sites in the Borough. A full list of the constraint layers is provided in the main SA report. The constraints affecting each site were identified and described prior to predicting likely sustainability impacts against the SA objectives.

Strategic Objectives

Generally the appraisal has highlighted that the majority of Strategic Objectives and SA objectives are compatible, however there are also many uncertainties. Most of the uncertainties in the appraisal surrounding the compatibility of objectives include the need for greater detail on development proposals and in terms of specific detail and design, for example, reducing pollution and prioritising development on previously developed land to determine compatibility.

Places

Overall it can be expected that the Spatial Strategy and Places policies will contribute positively to sustainable development. In particular, each Place contains a clearly presented Vision and Priorities for Action that should contribute to providing a locally distinctive approach to addressing issues and providing direction on the future evolution of a particular Place.

The Places in the Core Strategy are set out providing an introduction that describes its basic issues, a vision to guide its future evolution, priorities for action for the Council and partners (set out under the Strategic Objectives for the Core Strategy) and delivery including a policy to guide development management decisions. However, it is felt that some of the Places policies themselves (in terms of policy text) could more clearly incorporate the important priorities for action.

Recommendations for Places are included in the Recommendations and Monitoring section.

Strategic Sites

The appraisal has shown that the majority of Strategic Sites will contribute positively to sustainable development objectives in order to satisfy the requirements of the Core Strategy, in terms of housing delivery and the provision of commercial floorspace and community facilities.

The Strategic Sites in North Kensington should tackle existing issues in terms of poor economic performance and socio-economic deprivation. It is thought that the Core Strategy is on course to successfully capitalise on these opportunities and address existing issues.

Three of the sites however, have shown many uncertainties in terms of performance against environmental SA objectives. This is mainly due to a lack of consistency and detail in the information provided for them in the Allocation section in comparison to other sites. However, it is anticipated this detail may be provided in Supplementary Planning Documents or Area Action Plans planned or prepared.

Recommendations for Strategic Sites are included in the Recommendations and Monitoring section.

Development Management Policies

The Development Management Policies, grouped under their corresponding strategic objectives, will be used to determine planning applications and steer development. The Sustainability Appraisal has shown that the majority of these policies are likely to result in positive sustainable development for the Borough.

Policies grouped under Keeping Life Local, Better Travel choices, An Engaging Public Realm, Renewing the Legacy and Respecting Environmental Limits are identified to perform particularly well against the environmentally focussed SA objectives. This is because these policies focus on capitalising on what makes the Borough one of the most desirable places to live, work and visit, including attractive and safe walkable neighbourhoods, good access to local services and protection of public open space with a focus on protecting and enhancing biodiversity.

The Fostering Vitality and A Diversity of Housing policies tailored more towards provision of social and community facilities, housing and facilitating inclusion and equity among residents perform particularly strongly against the socially focused SA objectives. The scarcity of development land in the Borough has resulted in strong competition between commercial, residential and community and social uses. The policies' appreciation and balanced approach to these competing issues should enable development to proceed and housing delivery to be addressed without undue impact on social and community infrastructure.

The Infrastructure Delivery and Planning Obligations policy and in particular, Keeping Life Local and Fostering Vitality policies were identified to positively impact the economic SA objective to support and foster a diverse and vibrant local economy. The Borough benefits from numerous 'local' centres and its attractive natural and built environment contribute to maintaining their important individual identities and characters. The policies' support of appropriate commercial and community services provision at the local level, whilst maintaining a focus on larger development in more central locations, aligns with both the Borough's current and future vision to provide development and services at an appropriate scale and location to ensure ease of access for all borough residents.

Although, no policies were identified to result in a clear negative impact on any of the SA objectives, a number of uncertainties were highlighted by the appraisal, specifically, with regards to the Infrastructure Delivery and Planning Obligations and Hotels policies. The main reason for the uncertainty is the need for detail at a site development level or the limited information contained within the policies in order to undertake an informed appraisal. However, the implementation of these policies, as all development focussed policies, will draw on the criteria set out in more prescriptive development supporting policies. As such, it is likely that the outcome of many of the policies currently identified with an ‘uncertain’ impact could be positive.

Recommendations for Development Management Policies are included in the Recommendations and Monitoring section.

Cumulative Effects

One of the principal rationales for undertaking SEA (and SA) is the opportunity it presents, to identify and evaluate cumulative impacts. Further details of cumulative effects can be found within the main SA Report.

SA Objective	Cumulative effect
Biodiversity	The Places, Strategic Sites and Development Management Policies should result in a positive outcome for the natural environment and biodiversity; however, this will require careful monitoring of those policies identified as having uncertain impacts so as to ensure no further deterioration in performance against the SA objective and the Borough’s baseline indicators.
Climate Change	The majority of Places and Strategic Sites are likely to have negligible to positive impacts on climate change. The Development Management Policies are likely to have an overall positive impact on this SA objective, specifically the policies grouped under Keeping Life Local, Better Travel Choices and Respecting Environmental Limits.
Flood Risk	In combination, the Places, Strategic Sites and Development Management Policies should assist with reducing the risk of flooding in the Borough.
Air Quality	The majority of Places and Strategic Sites are likely to have positive impacts on air quality. Approximately one quarter of the Development Management Policies should also help improve air quality in the Borough with only a couple of policies identified to have an uncertain outcome on this SA objective. Cumulatively, the policies should result in a positive impact.
Parks & Open Spaces	The Core Strategy should have an overall positive impact on parks and open spaces in the Borough. The Core Strategy clearly identifies the value of parks and open spaces to the success of the Borough and throughout clearly articulates the need to preserve and enhance the existing provision.
Pollution	The majority of Places and Strategic Sites are likely to have a negligible to positive impact on pollution with the Development Management Policies likely to have a negligible impact. On balance, however, the policies’ cumulative impact is still likely to be positive.
Previously Developed Land	The majority of the Places and all the Strategic Sites Policies are expected to have positive impacts on this SA objective, however, the cumulative impact of the Development Management Policies was uncertain. Overall, it is likely that the cumulative impact will be positive.
Transport	Although some uncertainties were identified for the policies on this SA objective they are unlikely to detract from an overall positive cumulative impact.
Waste	Until the specific waste DPD has been developed it is not possible to clearly determine the likely cumulative impacts of the Core Strategy Policies on this SA objective.

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SA Objective	Cumulative effect
Energy Efficiency	The majority of Places and Strategic Sites are likely to have negligible to positive impacts on encouraging energy efficiency and although it was identified that several Development Management Policies could result in uncertain outcomes it is expected that the Development Management policy on climate change should ensure the cumulative impact of all policy implementation to be positive.
Cultural Heritage	The Core Strategy's explicit recognition of the value of the Borough's cultural heritage in combination with the existing Places, Strategic Sites and Development Management Policies should ensure an overall positive cumulative impact.
Crime	Overall it is expected that the Places, Strategic Sites and Development Management Policies should not impact negatively on and should help to address crime and anti-social behaviour in the Borough.
Equalities	For Places and Strategic Sites policies positive cumulative impacts are expected. Similarly, the Development Management Policies are also likely to have a cumulative positive effect on equalities in the Borough.
Community Facilities	The Core Strategy should result in a positive impact on this SA objective, in particular the Development Management Policies grouped under Keeping Life Local, Fostering Vitality, Diversity of Housing and Respecting Environmental Limits.
Housing	Although the majority of Places and Strategic Sites are likely to have positive impacts on housing, of all the Development Management policies identified as likely to have an impact on this SA objective over half were identified as uncertain. Cumulatively, however, it is likely that the overall outcome would be positive.
Health	For Places and Strategic Sites policies positive cumulative impacts are expected. The Development Management Policies are also expected to have a positive impact on the provision of accessible healthcare.
Economic Growth	Cumulatively, the Development Management Policies should have a positive impact on the SA objective to support a diverse and vibrant local economy to foster sustainable economic growth.

Conclusions

The Core Strategy has set out an ambitious approach to growth and development. It presents a suite of development management policies and identifies a number of key places and strategic sites earmarked for change and/or protection with the aim to create a legacy for the future. The Core Strategy proposes a higher level of housing growth from 2011/12 which should enable the Borough to capitalise on future economic opportunities and help work towards tackling existing issues such as the Borough's polarised economy and areas of high socio-economic deprivation. The Core Strategy's specific focus on North Kensington should help address such issues and bring about significant regeneration opportunities to an area beset by poor public transport accessibility, physical barriers to movement, high unemployment and other deprivation issues.

Overall, the Core Strategy presents balanced plans for development for its identified places and strategic sites, however, the success of these are likely to be, in part, dependent upon future transport plans within the Borough and the associated dependency of some strategic growth sites, including Kensal.

The Core Strategy has taken account of environmental constraints, such as the lack of land for development and scarcity of public open space. It has achieved this by focussing on the redevelopment of existing land that requires regeneration and/or redevelopment in order to meet or exceed current standards. Furthermore, the Core Strategy should ensure effective environmental protection, and in some

cases enhancement. The strategic sites and development management policies include a range of appropriate guidance or criteria to guide development; and in general, it is thought that the non-spatial 'thematic' policies in the Core Strategy relating to the environment should also be effective. In terms of climate change it is noted that the Core Strategy requires relatively stringent sustainable design and construction requirements. This policy in particular would benefit from being reflected in other Core Strategy policies for retail, housing, business etc. and also in the Strategic Sites and Places policies to clearly demonstrate requirements for development in mitigating and adapting to climate change. The principle of greater cross referencing of policies could be applied more widely within the Core Strategy. The identified positive environmental impacts – particularly through the Strategic Objectives Better Travel Choices and Respecting Environmental Limits, should assist with addressing the Borough's designation as an Air Quality Management Area.

A key issue for the Borough is housing affordability and availability and, in response to this, the Core Strategy is consistent with the current requirements of the London Plan (350 units per annum) and proposes to increase this figure to 600 units a year from 2011/2012 which slightly exceeds the revised London Plan figure⁵. The increase in housing delivery is to be accommodated, to a large extent, by the opportunities for regeneration in Kensal and Earl's Court. In terms of affordable housing, the Borough is planning for 200 units per annum from when the new London Plan is adopted. These proposals are ambitious in scale and should help working towards meeting the high housing need in the Borough.

A further key aim of the Core Strategy is to maintain and promote the Borough as a business and retail centre, hence enabling economic growth, without adversely impacting the Borough's world renowned cultural heritage. In light of this however, the SA highlighted the need to ensure that the other social and community facilities – such as healthcare services – are not negatively impacted by a focus on business and retail. The Core Strategy should avoid such impacts through ensuring policies safeguard social and community uses and the Strategic Sites and Places cater for the local social and community needs of the Borough's residents, in addition to the Borough's business and retail needs.

In summary, the Core Strategy is a commendable response to meeting the Borough's existing and potential future challenges. Its combination of development management policies and vision for its places and delivery of strategic sites should ensure a balanced and progressive approach to development and help to deliver the ambitions of the Core Strategy as a whole. The Sustainability Appraisal has found that cumulatively the policies in the Core Strategy should lead to positive sustainable development outcomes.

Recommendations and Monitoring

Recommendations were suggested to improve the sustainability of the Core Strategy Policies, and where necessary mitigate likely significant negative effects (see tables below). The first three tables provide a range of rather general recommendations to improve the sustainability performance of the Core Strategy Policies. These are not necessarily concerned with mitigating potential significant effects. The fourth table sets out Scott Wilson's recommendations for monitoring and links to significant effects highlighted in the appraisal. The main SA Report sets out mitigation measures in further detail as well as a range of measures to monitor likely significant effects.

⁵ The London Plan Spatial Development Strategy for Greater London – Consultation draft replacement plan (October 2009) proposes an annual average housing provision target of 585 between 2011 and 2021.

Places Recommendations:

Policy	Recommendations
CP 1: Core Policy: Quanta of Development	<ul style="list-style-type: none"> Policy requires clarification on period of time for the provision of office floorspace. Acknowledge Chapter 37 Infrastructure within the policy wording and that infrastructure requirements will be reviewed as part of the regular review process.
CP 2: Places	<ul style="list-style-type: none"> Paragraph 4.4.5 – should reference be to Section 2(a)? Could additionally specify “...and the way they function <i>for all that live, work, study in or visit the Borough.</i>”
CP 3: North Kensington	<ul style="list-style-type: none"> Could additionally specify in the policy that the Council will regenerate and develop North Kensington in a sustainable way, in order to achieve sustainable development outcomes.
CP 4: Kensal	<ul style="list-style-type: none"> Paragraph 5.1.9 – should reference be to Chapter 20? ‘Respecting Environmental Limits’ is listed as the most important priority for action for Kensal, but the environment has not been recognised in the policy. Development at Kensal is aiming for an exemplar of environmentally responsive development. <p><i>Recommendations to Priorities for Action supporting policy text:</i></p> <ul style="list-style-type: none"> Consider mentioning that proposals for major development along the Blue Ribbon Network must be accompanied by a safety and risk assessment in accordance with policy 4C.15 of the London Plan. Consider mentioning that air quality will be improved by encouraging proposals and the design of solutions that improve air quality and cross-reference to policy CE 5 Air Quality. Development close to the canal in the area should consider the natural forces of the canal in development e.g. flooding, erosion, etc.
CP 5: Golborne / Trellick	<ul style="list-style-type: none"> ‘Renewing the Legacy’ is listed as the most important priority for action for Golborne / Trellick and, although regeneration is mentioned within the policy, preserving the special architectural character and historic interest of the building has not been recognised. <p><i>Recommendations to Priorities for Action supporting policy text:</i></p> <ul style="list-style-type: none"> Biodiversity and green infrastructure enhancements should be specified in the infrastructure requirements.
CP 7: Westway	<ul style="list-style-type: none"> Policy could outline examples of the types of improvements within the policy.
CP 8: Latimer	<ul style="list-style-type: none"> ‘Renewing the Legacy’ and ‘An Engaging Public Realm’ are listed as the most important priorities for action for Latimer, but improved connectivity within the area, visual improvements and improvement in the provision of open space have not been recognised in the policy. <p><i>Recommendations to Priorities for Action supporting policy text:</i></p> <ul style="list-style-type: none"> Investigate the role the Council and others such as TfL could play in reducing dust and noise problems in the Latimer area. If healthcare provision is to be included in the community facilities for this place this should be mentioned in supporting text, however it is acknowledged that this is mentioned in infrastructure needs. The area contains Notting Barns ward which has shown in terms of crime deprivation some areas within the ward that contain high levels of crime. We would encourage the inclusion of community safety improvements to the area.
CP 9: Earl’s Court	<p><i>Recommendations to Priorities for Action supporting policy text:</i></p> <ul style="list-style-type: none"> Green infrastructure enhancements should be specified in the infrastructure requirements.

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Policy	Recommendations
	<ul style="list-style-type: none"> There is an identified area of flood risk (flood zone 2 & 3) located adjacent to the area within the London Borough of Hammersmith & Fulham boundary (west). Any development in this area needs to consider the potential flood risk. Also cross-reference to policy CE 2 Flooding.
CP 10: Kensington High Street	<p><i>Recommendations to Priorities for Action supporting policy text:</i></p> <ul style="list-style-type: none"> Consider the impact of increased traffic at the site (pedestrian and vehicular), if any, from increased visitor numbers and how this could be addressed in the context of both the site and the Kensington High Street Place. This could be emphasised in supporting text, however it is acknowledged that access improvements are mentioned in infrastructure needs.
CP 12: Brompton Cross	<ul style="list-style-type: none"> 'Renewing the Legacy' is the second most important priority for action for Brompton Cross, but listed buildings of great local significance that establishes the sense of identity have not been recognised in the policy.
CP 14: King's Road / Sloane Square	<ul style="list-style-type: none"> 'Better Travel Choices' and 'Keeping Life Local' are listed as the second and third most important priorities for action for King's Road / Sloane Square, but ease of access to the centre and meeting the day-to-day shopping and other needs of residents in the area have not been recognised in the policy. <p><i>Recommendations to Priorities for Action supporting policy text:</i></p> <ul style="list-style-type: none"> There is an identified area of flood risk (flood zone 2 & 3) located in the area adjoining the Thames to the south. Any development in this area needs to consider the potential flood risk. Also cross-reference to policy CE 2 Flooding.
CP 15: Notting Hill Gate	<ul style="list-style-type: none"> 'An Engaging Public Realm' and 'Better Travel Choices' are jointly listed as the third most important priorities for action for Notting Hill Gate, but improving the pedestrian environment and ease of access around the centre have not been recognised in the policy. This is particularly important given that the policy endorses high trip generating uses. <p><i>Recommendations to Priorities for Action supporting policy text:</i></p> <ul style="list-style-type: none"> The area contains Pembridge ward which has shown in terms of crime deprivation some areas within the ward that contain high levels of crime. We would encourage the inclusion of community safety improvements to the area.
CP 16: Fulham Road	<ul style="list-style-type: none"> 'An Engaging Public Realm' is listed as the second most important priority for action for Fulham Road, but improving the public realm and exploring the use of Brompton Cemetery for passive recreational use have not been recognised in the policy. The policy in general lacks detail. <p><i>Recommendations to Priorities for Action supporting policy text:</i></p> <ul style="list-style-type: none"> There is an identified area of flood risk (flood zone 2 & 3) located toward the London Borough of Hammersmith & Fulham boundary (south west corner of the area). Any development in this area needs to consider the potential flood risk. Also cross-reference to policy CE 2 Flooding.
CP 17: Lots Road / World's End	<ul style="list-style-type: none"> 'Keeping Life Local' is listed as the third most important priority for action for Lots Road / World's End, but the need for higher quality local shopping and social and community uses such as healthcare have not been recognised in the policy.

Strategic Sites Recommendations

Policy	Recommendation
CA 2: Wornington Green	<p><i>Recommendations to Allocation supporting policy text:</i></p> <ul style="list-style-type: none"> Site potential for improving waste management should be considered.
CA 3: Land Adjacent to Trellick Tower	<p><i>Recommendations to Allocation supporting policy text:</i></p> <ul style="list-style-type: none"> Identified constraint adjoining the site (local Site of Importance for Nature Conservation) should be considered in any design of the new development.
CA 4: North Kensington Sports Centre	<p><i>Recommendations to Allocation supporting policy text:</i></p> <ul style="list-style-type: none"> Mention that remodelling and/or new development will incorporate the principles of sustainable design and construction. Assess level of land contamination, if any, and how this could be addressed through the allocation.
CA 5: Allocation for The former Commonwealth Institute	<p><i>Recommendations to Allocation supporting policy text:</i></p> <ul style="list-style-type: none"> Consider the impact of increased traffic at the site (pedestrian and vehicular), if any, from increased visitor numbers and how this could be addressed in the context of both the site and the Kensington High Street Place
CA 6: Warwick Road	<ul style="list-style-type: none"> Identify that sustainable design and construction will be a principle of the development and that it will maximise the opportunities of scale that the combined site offers. <p><i>Recommendations to Allocation supporting policy text:</i></p> <ul style="list-style-type: none"> Site potential for improving waste management should be considered. Assess level of land contamination, if any, and how this could be addressed through the allocation.

Development Management Policies Recommendations

Policy	Recommendation
C 1 – Infrastructure Delivery and Planning Obligations	<ul style="list-style-type: none"> Look to ‘enhance’ and maximise benefit against the SA objectives, especially through objectives that require improvement as highlighted in the SA Update Report – Biodiversity, Crime and Housing and area priorities.
CF 1 – Location of New Shop Uses	<ul style="list-style-type: none"> Strengthen waste management strategy – cross-reference to policy CE 3 Waste. Avoid a negative impact on the health needs of residents - monitor impacts on crime, health and housing when provisioning for retail, hotel and business uses.
CF 2 – Retail Development within Town Centres	
CF 3 – Diversity of Uses within Town Centres	<ul style="list-style-type: none"> Avoid a negative impact on the health needs of residents - monitor impacts on crime, health and housing when provisioning for retail, hotel and business uses.
CF 5 – Location of Business Uses	<ul style="list-style-type: none"> Maximise development on PDL and avoid development on green field, open space, ecologically and historically important land – cross-reference to appropriate policies. Avoid a negative impact on the housing and health needs of residents - monitor impacts on crime, health and housing when provisioning for retail, hotel and business uses.
CF 8 – Hotels	<ul style="list-style-type: none"> Maximise development on PDL and avoid development on green field, open space, ecologically and historically important land – cross-reference to appropriate policies. Strengthen waste management strategy – cross-reference to policy CE 3 Waste. Encourage sustainable construction and design – cross-reference to CE 1 Climate

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Policy	Recommendation
	Change and CE 3 Waste.
CT 1 – Improving Alternatives to Car Use	<ul style="list-style-type: none"> Where an area has a PTAL rating lower than 4 but has been prioritised in terms of development needs, consider how the rating could be increased before relocating development to another area.
CT 2 – New and Enhanced Rail Infrastructure	<ul style="list-style-type: none"> Maximise development on PDL – cross-reference to appropriate policies.
CR 3 - Street and Outdoor Life	<ul style="list-style-type: none"> Suggest amending (a. i.) to ‘maintain “and improve” the free, safe and secure passage of pedestrians;
CL 5 - Amenity	<ul style="list-style-type: none"> Consider changing (a) “significantly reduced” to “adversely impacted”. Consider re-wording (b) to reduce ambiguity. Consider deleting “harmful” from (c). Consider changing “significant” to “adverse”. Make specific reference to Policy CE 1 – Climate Change.
CL 6 - Small-scale Alterations and Additions	<ul style="list-style-type: none"> Suggest addressing “micro-generation” separately in the policy to “telecommunications, plant ... and other mechanical equipment”. Suggest new part (c) specific to micro-generation. Suggest re-wording to “micro-generation to be sited so as to maximise its efficiency without significantly impairing visual amenity”.
CE 3 - Waste	<ul style="list-style-type: none"> Consider the potential for Energy from Waste.

Monitoring Recommendations

Significant effect	Monitoring suggestion
Uncertainty exists for the impact of the Core Strategy on biodiversity. This is significant as the Sustainability Appraisal Update Report identified some baseline indicators for biodiversity had worsened. It will be critical to monitor the plan against biodiversity indicators to ensure that further species populations in the Borough do not continue to fall in numbers.	<ul style="list-style-type: none"> Monitor using relevant Biodiversity indicators from Chapter 38 Monitoring in the Core Strategy.
The Sustainability Appraisal Update Report (2009) identified some baseline indicators for crime had worsened and there are no specific indicators set out in the Core Strategy to monitor this. However, despite uncertainty over the Street Markets policy’s impact on crime, several policies were assessed to have a positive effect on the crime SA objective. Policies where a positive impact on the crime SA objective has occurred should be carefully implemented and monitored to maximise their benefit.	<ul style="list-style-type: none"> Monitor using appropriate indicators as prescribed by the National Indicators for Local Authorities and Local Authority Partnerships⁶ and/or specific indicators relevant to monitoring the performance of the Designing Out Crime SPD.
Uncertainty exists for the impact of the Core Strategy on housing. This is significant as the Sustainability Appraisal Update Report (2009) identified some baseline indicators for housing which had worsened. It will be important to monitor supply and demand for housing and conditions within the housing market in the Borough.	<ul style="list-style-type: none"> Monitor using relevant indicators for A Diversity of Housing, Renewing the Legacy and Respecting Environmental Limits from Chapter 38 Monitoring in the Core Strategy.
There is a relatively high degree of uncertainty regarding the effect of the Core Strategy on prioritising development on previously developed land. However, given the Borough’s limited land	<ul style="list-style-type: none"> Monitor using relevant indicators as identified in the Annual Monitoring Report.

⁶ CLG (2009) National Indicators for Local Authorities and Local Authority Partnerships: Updated National Indicator Definitions, Department for Communities and Local Government, available [online] at <http://www.communities.gov.uk/documents/localgovernment/pdf/11471951.pdf>, accessed 27/10/09.

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Significant effect	Monitoring suggestion
<p>availability, its appreciation of the value of its open space and its performance against government indicators regarding previously developed land this may not necessarily prove to be a significant issue.</p>	
<p>There is some uncertainty surrounding how the Core Strategy policies grouped under the Fostering Vitality would impact on parks and open spaces. It would be useful to determine the plan's impact on the provision of parks and open spaces due to their scarcity.</p>	<ul style="list-style-type: none"> • Monitor using relevant indicators for An Engaging Public Realm from Chapter 38 Monitoring in the Core Strategy.
<p>There is a need to monitor flood risk closely. It is important to make use of the SFRA and work the Council has undertaken on applying the sequential test to strategic development sites. This approach should also be applied to development expected in the Borough's Places. There may also be some benefit to recording the mitigation measures that have been put in place, so that their effectiveness (in terms of wider sustainability objectives as well as flood risk reduction) can be monitored.</p>	<ul style="list-style-type: none"> • Monitor using relevant Flooding indicators from Chapter 38 Monitoring in the Core Strategy. • The effectiveness of implemented flood mitigation measures.
<p>A key effect of the plan will be to stimulate further socio-economic regeneration in North Kensington.</p>	<ul style="list-style-type: none"> • Monitor using relevant Strategic Site indicators for Kensal, Wornington Green, Land adjacent to Trellick Tower and North Kensington Sports Centre from Chapter 38 Monitoring in the Core Strategy. • Monitor relevant economic, employment and deprivational indicators in North Kensington including key locations such as Kensal.
<p>The Core Strategy proposes a significant amount of new and revised transport infrastructure and streetscaping. The effectiveness of these proposals in facilitating and encouraging people to use more sustainable forms of transport should be carefully assessed.</p>	<ul style="list-style-type: none"> • Monitor using relevant indicators for An Engaging Public Realm and Better Travel Choices from Chapter 38 Monitoring in the Core Strategy.
<p>The entire Borough is a designated Air Quality Management Area and, although the Core Strategy generally has a positive impact against the air quality SA objective for air quality, there were some uncertainties identified. Aspire to maximise positive impacts on the SA air quality objective.</p>	<ul style="list-style-type: none"> • Monitor using relevant indicators for Respecting Environmental Limits from Chapter 38 Monitoring in the Core Strategy.
<p>There is a need to monitor provision of healthcare and to ensure that retail and business uses are not prioritised over access to essential community services.</p>	<ul style="list-style-type: none"> • Monitor using relevant indicators for Keeping Life Local, Better Travel Choices and Fostering Vitality from Chapter 38 Monitoring in the Core Strategy.

Next Steps

There is now a period of formal consultation on the **Proposed Submission Core Strategy for the Royal Borough of Kensington and Chelsea with a focus on North Kensington**. The SA Report will be available for consultation alongside the Core Strategy. It is the intention of the SA that it should aid consultation on the Core Strategy by allowing for more informed consultation responses.

Following the receipt of comments from the public and other stakeholders (e.g. statutory consultation bodies - Natural England, English Heritage and the Environment Agency), the consultation responses as well as the findings of the SA will be further taken into account by the Council in drawing up the submission version of the Core Strategy.

Following this the Core Strategy will be drafted in its final form and submitted to Government. There will be further consultation, before an independent examination by a planning inspector of the submitted document.

Should the plan undergo any further significant change in the future, including as a result of taking onboard consultation responses, the significant changes will also be submitted for further SA.