



building on success

Miscellaneous Matters

Addendum to Core Strategy
Sustainability Appraisal/Strategic
Environmental Assessment

Partial Review of the Core Strategy

July 2013

Regulation 19, Town and Country Planning (Local Planning) (England) Regulations 2012



THE ROYAL BOROUGH OF
**KENSINGTON
AND CHELSEA**

Contents	Page
1.0 Purpose of the Sustainability Appraisal and the Sustainability Appraisal Report.....	1
2.0 History for the Core Strategy SA.....	2
3.0 Addendum to Core Strategy SA.....	3
4.0 Policy Background.....	3
5.0 Assessment of the Policy Options.....	4
6.0 Fostering Vitality.....	5
7.0 An Engaging Public Realm.....	13
8.0 Better Travel Choices.....	14
9.0 Respecting Environmental Limits.....	17
10.0 Strategic Objectives.....	24
11.0 Preferred Option.....	28
12.0 Mitigation and Monitoring.....	28
13.0 Conclusions.....	29
Figure 1 Five Stages of SA preparation process.....	2
Table 5 Marking Scheme.....	5
Table CF9	6
Map 1 Diplomatic and Allied Uses Proposals Map.....	10
Table CF10	11
Table CR7/CT1	15
Table CE6	18
Table CE7	20
Table CP3	24
Table CP4	26
Table 12 Proposed Monitoring Data.....	29

Miscellaneous Matters

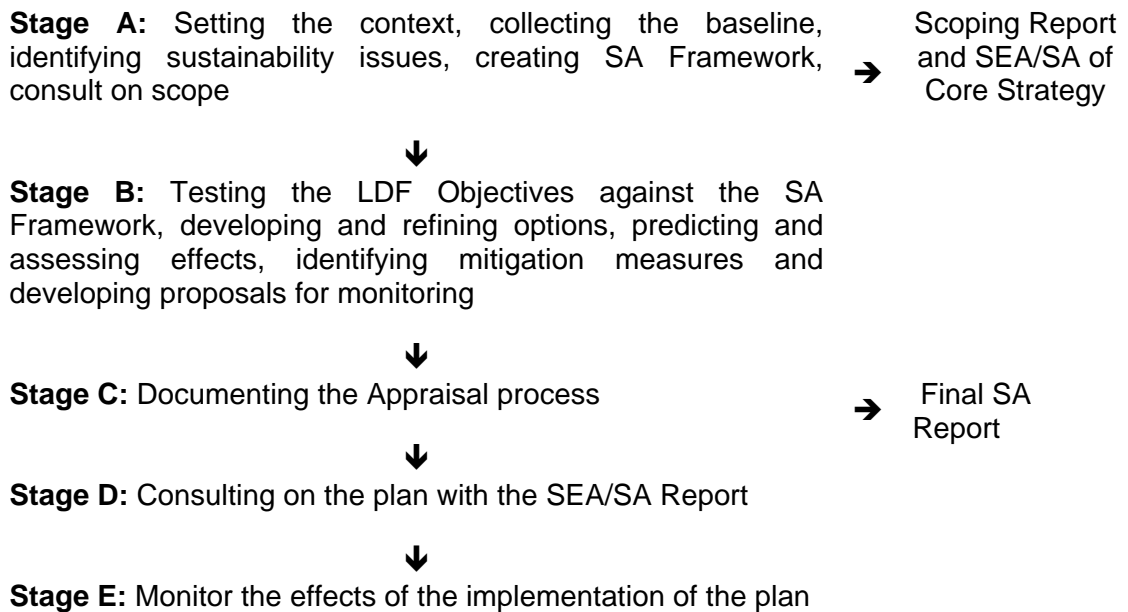
Addendum to Core Strategy SA/SEA

1.0 Purpose of the Sustainability Appraisal and the Sustainability Appraisal Report

- 1.1 The Strategic Environmental Assessment (SEA) / Sustainability Appraisal (SA) of Miscellaneous Matters has been undertaken by the Planning and Borough Development Department of the Royal Borough of Kensington and Chelsea.
- 1.2 SEA involves the systematic identification and evaluation of the environmental impacts of a strategic action (e.g. a plan or programme). In 2001, the EU legislated for SEA with the adoption of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive'). The Directive entered into force in the UK on 21 July 2004 and applies to a range of English plans and programmes including Local Development Frameworks (LDFs).
- 1.3 The UK Government has chosen to implement the SEA directive through 'Sustainability Appraisal' (SA), a method that fully encompasses economic and social concerns, as well as those of the environment. Under the Planning and Compulsory Purchase Act 2004 (PCPA), Local Authorities must undertake SA for each of their Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs) – the constituent parts of the LDF.
- 1.4 A sustainability framework has been prepared by the Council for all documents within the LDF. This is reviewed with each individual document, and an addendum scoping report prepared.
- 1.5 In October 2005, the Government published guidance on undertaking combined SEA/SA of LDFs ('the Guidance'¹). This guidance was followed for the production of the SA.
- 1.6 The SEA Directive sets out a statutory process that must be followed. The SEA Requirement Checklist (Table 1.1) and Quality Assurance checklist (Appendix V) have been used to ensure the requirements of the SEA Directive are met.
- 1.7 This SA Report supports the public consultation on the Miscellaneous Matters document, as required by Regulation 24 of the Town and Country Planning (Local Development) (England) Regulations, 2004. It is intended to inform decision makers within the Council, alongside public and stakeholder responses to the consultation
- 1.8 Figure 1 shows the five-stage approach of the SA/SEA process recommended in the Guidance.

¹ODPM (2005) Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents.

Figure 1: Five Stages of SA preparation process (ODPM, 2005 p.58)



- 1.9 It should be noted that is an addendum to the Final SA that was prepared for the Core Strategy in October 2009. It does not go into the level of detail of the original SA but simply appraises the policies proposed for inclusion, and ensure that their inclusion would not have unintended consequences. These 'extant' policies have been in place and well used for the past 20 years. No negative impacts have been reported during these years and therefore they are not expected to be harmful.

2.0 History for the Core Strategy SA

- 2.1 The SA for the Core Strategy commenced during 2005, with the compilation of evidence base information and a scoping consultation with the statutory consultees (Environment Agency, Natural England's two predecessor bodies and English Heritage) and other key stakeholders. At each stage in the preparation of the Core Strategy (Issues and Options, Preferred Options and Publication), the SA has tested the Core Strategy against the 16 objectives that reflect relevant sustainable development policy objectives.
- 2.2 The Core Strategy and a number of options were tested to determine their potential to give rise to significant effects, ways of mitigating adverse effects and maximising beneficial effects. As part of the iterative process of developing the Core Strategy, recommendations and amendments have been made by the SA at various stages and incorporated into the Core Strategy as it has developed. The final SA report dates from October 2009.
- 2.3 Before the adoption of the Core Strategy's a number of supplementary documents have been adopted, including transport, air quality, and noise and vibration. Each of these has been subject to SA, and are linked to the extant UDP polices which are now proposed to be incorporated into the Local Plan.

3.0 Addendum to Core Strategy SA

- 3.1 This '*Miscellaneous Matters*' policy review covers matters not addressed in other topic reviews. It deals with some current UDP policies, and also picks up other matters that need to be addressed in the light of the National Planning Policy Framework (NPPF) and changes to regulations – such as the need to rename the Core Strategy a Local Plan.
- 3.2 The purpose of this report is to ensure that the inclusion of these miscellaneous policies within the Local Plan has been informed through a formal process of Sustainability Appraisal/Strategic Environmental Appraisal. Whilst the process is simply to bring existing policies from the UDP to the Core Strategy, the UDP policies were not subject to an initial SA/SEA as the UDP predated the process at the time of its adoption. However, the topics were later assessed through the SA of Supplementary Planning Documents and the Core Strategy.
- 3.3 This addendum report provides an update by assessing the policies to be incorporated from the old UDP to the Local Plan, and should be read in conjunction with the original SA for the Core Strategy. The update does not contain any substantive change to policy; however, it is considered that to bring the Local Plan into line with current legislative requirements, the 'saved' policies should be subject to an SA appraisal.
- 3.4 These 'saved' policies are intrinsically linked to the existing Core Strategy policies which were subjected to the SA process in 2009. The incorporation of the 'saved' policies will give more weight to the aims and requirements of the CS strategic objectives and policies. Although these 'saved' UDP policies have been successfully used in the borough over the past 20 years, their appraisal by this addendum SA assessed the potential impacts and includes monitoring and mitigation measures to reduce them.
- 3.5 It should be stressed that these amendments are **not intended to alter the aim of the policies**, nor the meaning of the plan taken as a whole. We are suggesting minor amendments to the wording to bring the policies and the text up to date and ensure they are as effective as possible.
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4.0 Policy Background

- 4.1 The Royal Borough of Kensington and Chelsea adopted its Core Strategy in December 2010. This was based upon seven strategic objectives; to *Keep Life Local*; *Foster Vitality*; offer *Better Travel Choices*; create an *Engaging Public Realm*, *Renew the Legacy*, provide for a *Diversity of Housing* and *Respect Environmental Limits*. Of these, *Keeping Life Local*, *Engaging Public Realm*, *Renewing the Legacy* and *Diversity of Housing* are the subject of a separate review. This section sets out the background to the remaining chapters, and explains how the extant UDP policies will be integrated as appropriate.
- 4.2 The principal topics that are being brought forward relate to:
- Temporary sleeping accommodation

- Diplomatic and allied uses
 - Off street coach parking facilities
 - Public transport interchanges
 - Noise and vibration
 - Contaminated Land
- 4.3 As well as bringing all the relevant policies into a single document (and ultimately allowing for the deletion of the entire UDP) a number of minor changes are proposed. Examples include removing reference to the Planning Policy Statements, the Government guidance now superseded by the National Planning Policy Framework.
- 4.4 The proposed policies for inclusion and incorporation into the Local Plan are set out in the following sections, and their compatibility appraised where necessary against the SA objectives. Option 1 ('the policy') represents the proposed policy inclusion to the CS/Local Plan. The alternative Option 2 for the purposes of assessing the policies against the SA objectives will be deletion of the UDP extant policies without incorporating any changes or additional policies into the CS/Local Plan, in other words 'no policy'.
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5.0 Assessment of the Policy Options

- 5.1 Under the SEA Directive, plan and programme, proponents should ensure that: "reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated" (Article 5(1)) and the Environmental Report should include "an outline of the reasons for selecting the alternatives dealt with" (Annex I (h)).
- 5.2 There are two options to consider for each policy, which are the following:
- Option 1:** The Council should incorporate the extant policy into the Local Plan.
- Option 2:** The Council should not incorporate the extant policies into the Local Plan.
- 5.3 The aims of the different Policy options are to protect assets that are important to the community and to the historic environment. It is considered that the Council's 16 SA objectives set out in the LDF SEA/SA Scoping Report are appropriate to assess the implications of the emerging policy.

SA objectives

1. To conserve and enhance the natural environment and biodiversity
2. To 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. To encourage social inclusion (*including access*), equity, the promotion of equality and a respect for diversity
5. To minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables and adopt measures to adapt to climate change
6. To reduce the risk of flooding to current and future residents

7. To improve air quality in the Royal Borough
8. To protect and enhance the Royal Borough's parks and open spaces
9. To reduce pollution of air, water and land
- 9a. To 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. To reduce the amount of waste produced and maximise the amount of waste that is recycled
12. 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
13. To aim that the housing needs of the Royal Borough's residents are met
14. To encourage energy efficiency through building design; maximise the re-use of building's and the recycling of building materials
15. To 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

- 5.4 The following section contains individual tables which assess the compatibility of the different policy options with the SA objectives. The text for consideration is show in red. Table 2.1 shows the marking scheme used.

Table 5: Marking scheme

+	Objectives are compatible
-	Objectives are conflicting
?	Objective correlation is unknown
X	No Objective correlation (i.e. unlikely to have a significant effect)

6.0 Fostering vitality

- 6.1 This chapter is concerned with those uses which contribute to the vitality of the Royal Borough. It is concerned with the wide variety of cultural, creative and commercial uses which can significantly contribute to the well being of residents and the capital's role as a world city. This is articulated by Strategic Objective CO2.
- 6.2 The policy review intends to bring the extant UDP policies relating to temporary sleeping accommodation and diplomatic uses within the Fostering Vitality chapter.
- 6.3 Temporary sleeping accommodation.**

Whilst many people visiting the Borough will stay in conventional hotels, they will also use a number of other types of accommodation, including holiday lettings, lettings by companies for worker accommodation and time-share schemes. Under the Greater London Council (General Powers Act) 1973 accommodation occupied by the same person for less than 90 consecutive nights, is considered to be temporary. Planning permission is required for a change of use form permanent to temporary residential accommodation. This change of use can have implications on the Borough's stock of permanent accommodation, and therefore will be resisted. This approach is was set

out in the extant UDP policies T5 and T6 which are now proposed to be articulated by **Policy CF9**.

“The Council will resist the provision of holiday lets and other temporary sleeping accommodation where it involves the loss of permanent residential accommodation”.

Table CF9

SA OBJECTIVE	Option 1	Option 2	COMMENT
1. To conserve and enhance the natural environment and biodiversity.	X	X	Neither option has an obvious impact on the natural environment.
2. Reduce crime and anti-social behaviour and the fear of crime.	+	-	The presence of temporary sleeping accommodation, particularly where poorly managed, could lead to a detriment of amenity and potentially anti-social and crime issues.
3. To support a diverse and vibrant local economy to foster sustainable economic growth.	+	-	The provision of short terms lets would support tourism and the visitor economy, which could be considered to contribute to the vibrancy and diversity of the economy of an area.
4. Encourage social inclusion, equity, the promotion of equality and a respect for diversity.	X	X	There is no correlation between the policy and this SA objective.
5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables.	X	X	There is no correlation between the policy and this SA objective.
6. Reduce the risk of flooding to current and future residents.	X	X	There is no correlation between the policy and this SA objective.
7. Improve air quality in the Royal Borough.	X	X	There is no a clear correlation between the policy and this SA objective.
8. Protect and enhance the Royal Borough’s parks and open spaces.	X	X	There is no correlation between the policy and this SA objective.
9. Reduce pollution of air, water and land.	X	X	There is no a clear correlation between the policy and this SA objective.

9a. Prioritize development on previously developed land.	X	X	As the land is already developed, neither option will have an effect.
10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic.	+/x	-/x	The policy does not have a strong relationship with traffic/transport. However, resisting the provision of short term lets in favour of the protection of existing permanent residential accommodation could potentially lead to a reduction in trip generation, e.g. pick up and drop off services, coaches, taxis and private hire vehicles, all requiring on street set down areas and parking.
11. Reduce the amount of waste produced and maximise the amount of waste that is recycled.	X	X	There is no correlation between the policy and this SA objective.
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.	X	X	There is no correlation between the policy and this SA objective.
13. To aim that the housing needs of the Royal Borough's residents are met.	+	-	This policy would protect the Borough's existing housing stock therefore assisting the housing needs of local residents.
14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials.	X	X	There is no correlation between the policy and this SA objective.
15. Ensure the provision of accessible health care for all Borough residents.	X	X	There is no correlation between the policy and this SA objective.
16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage.	+	-	The introduction of a short term let uses within an area, introduces a commercial element which can have a negative impact upon the character and appearance of an area. Higher turnover of residents can lends a sense of impermanency.

6.4 Explanation of table CF9

- 6.4.1 Neither Option 1 nor 2 are likely to have a significant effect on 11 of the 17 objectives. This is due to the specific nature of the policy. The options would not affect 1, 5, 6, 7, 8, 9, 9a, 11, 12, 14 and 15.
- 6.4.2 Both options have a different affect on the remainder of the SA objectives.
- 6.4.3 Whilst hotels and short term lets can contribute greatly to both the Borough's economy and to its reputation, they are not always good neighbours. Poorly run hotels can cause problems, and a concentration of hotels in a residential area can change the area's character. Introducing a commercial element with a higher turnover of residents can lend a sense of impermanency and damage the sense of community that would otherwise develop within a permanent residential area. For this reason, Option 1 would have a positive relationship with SA objective 2 and 16 and Option 2 would have a negative relationship.
- 6.4.4 With regard to the relationship to SA Objective 3, the visitor economy would be supported by Option 2 allowing more temporary sleeping accommodation and short term lets, whereas Option 1 would have a potentially negative impact upon the local economy. As permanent residents contribute to the local economy in any case, the negative impact in this instance is considered to be negligible. Hotels are protected throughout the borough outside of Earl's Court ward (policy CF8). The impact of resisting further temporary sleeping accommodation only on the occasions where it would result in the loss of permanent residential accommodation, is not considered would have such an economic impact as to be considered harmful overall.
- 6.4.5 There is a potential positive relationship between Option 1 and objective 10, whereby the resistance of short term lets would arguably result in reduced trip generation associated with taxis, coaches, private hire vehicles etc.
- 6.4.6 There is a positive relationship between Option 1 and objective 13, as the policy would go towards protecting the existing housing stock in the borough. This policy is linked to the current housing review which sets targets for housing provision. Option 1 would support the borough's existing housing stock and resist its loss to short term or temporary sleeping accommodation. It is therefore in line with the aims of existing and emerging policy. Whilst there is a potential negative impact with regard to tourism and the visitor economy, the positive impacts identified against other SA objectives outweighs this.
- 6.4.7 It is not anticipated that the proposed policy would have a significant temporary effect, either positive or negative, on the SA objectives.
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6.5 Diplomatic and allied uses.

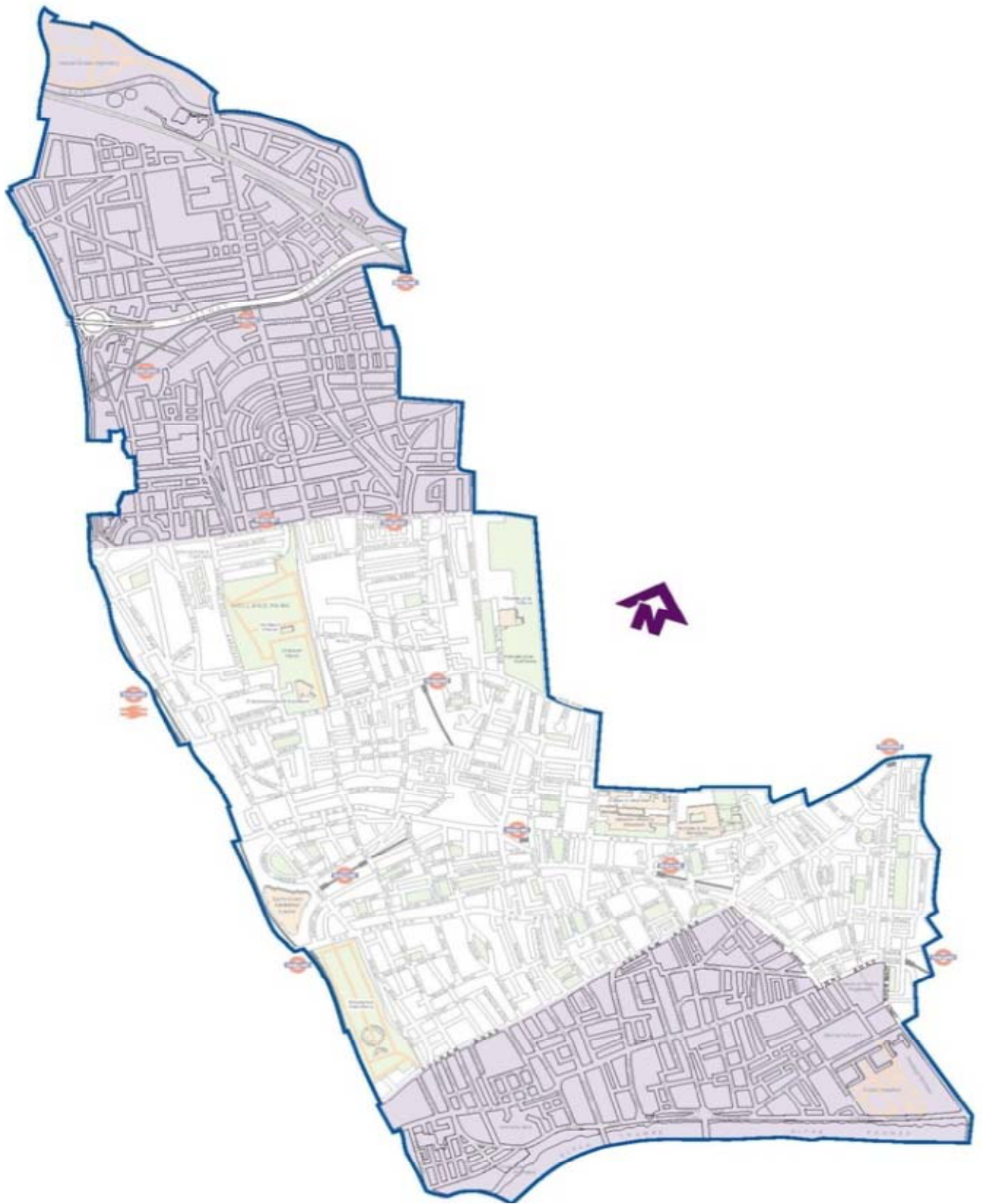
- 6.5.1 There are a considerable number of diplomatic uses in the Borough. This reflects the Borough's central location and the prestige associated with a Kensington and Chelsea address. However, the Council recognises that these uses can have an impact on both the character and the amenity of the Borough. This impact is often associated with traffic generation and with the introduction of quasi commercial uses in residential areas. The extant UDP policies E28 and E29 defined those areas in

which diplomatic uses should be located. This is brought forward in the new **Policy CF10**.

Policy CF10

“The Council will ensure that the impact of diplomatic missions and other activities in the Borough are minimised. To do this the Council will require diplomatic uses to be located in the area indicated on the Diplomatic and Allied Uses Proposals Map.”

Map 1: Diplomatic and Allied Uses Proposals Map



The shaded areas are those which are considered to be unsuitable for such uses.

Table CF10

SA OBJECTIVE	Option 1	Option 2	COMMENT
1. To conserve and enhance the natural environment and biodiversity.	X	X	Neither option has an obvious impact on the natural environment.
2. Reduce crime and anti-social behaviour and the fear of crime.	+	-	Fear of crime and anti-social behaviour associated with gatherings and demonstrations if embassies located in unsuitable areas.
3. To support a diverse and vibrant local economy to foster sustainable economic growth.	X	X	There is no correlation between the policy and this SA objective.
4. Encourage social inclusion, equity, the promotion of equality and a respect for diversity.	X	X	There is no correlation between the policy and this SA objective.
5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables.	X	X	There is no correlation between the policy and this SA objective.
6. Reduce the risk of flooding to current and future residents.	X	X	There is no correlation between the policy and this SA objective.
7. Improve air quality in the Royal Borough.	X	X	There is no clear correlation between the policy and this SA objective.
8. Protect and enhance the Royal Borough's parks and open spaces.	X	X	There is no correlation between the policy and this SA objective.
9. Reduce pollution of air, water and land.	X	X	There is no a clear correlation between the policy and this SA objective.
9a. Prioritize development on previously developed land.	X	X	There is no correlation between the policy and this SA objective.
10. To promote traffic reduction and encourage	+	-	Diplomatic uses can contribute significantly to traffic generation in

more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic.			their area which can negatively impact upon the surrounding character and amenity.
11. Reduce the amount of waste produced and maximise the amount of waste that is recycled.	X	X	There is no correlation between the policy and this SA objective.
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.	X	X	There is no correlation between the policy and this SA objective.
13. To aim that the housing needs of the Royal Borough's residents are met.	x/+	x/-	The policy would allow for the resistance of a change of use from C3 to sui generis thus protecting the housing stock of the borough, potentially helping housing need to be met.
14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials.	X	X	There is no correlation between the policy and this SA objective.
15. Ensure the provision of accessible health care for all Borough residents.	X	X	There is no correlation between the policy and this SA objective.
16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage.	x/+	x/-	The policy could potentially help to protect the local distinctiveness of a residential area.

6.6 Explanation of Table CF10

6.6.1 Due to the specific nature of this policy, the options correlate with 4 of the 17 objectives.

6.6.2 Option 1 has a positive relationship with SA objective 2. Diplomatic uses bring with them associated activity which can conflict with day to day residential living. This can include occasional demonstrations which disrupt residents and raise the fear of

further associated anti-social behaviour and crime. Where consular assistance is offered, people may queue for services throughout the day which brings with it the typical issues which arise when groups congregate in terms of noise and litter, as well as loitering. The security measures required by some embassies can create unease amongst residents. Restricting diplomatic uses to appropriate areas can avoid this occurring and protect residents' amenity.

- 6.6.3 Option 1 has a positive relationship with objective 10. Traffic and highways issues can arise from these uses due to increased trip generation with diplomatic vehicles causing congestion when picking up, waiting and dropping off. The Council's Transportation team have assessed the capacity of the roads around the shaded areas and established that they are unsuitable for diplomatic uses. These areas have been excluded because the properties are generally of a smaller scale and in residential use, the amount of parking space available is generally inadequate and the road network in these areas cannot accommodate the additional traffic generated by diplomatic uses
 - 6.6.4 Option 1 also has a potentially positive relationship with SA objective 13, whereby it would resist the conversion of a permanent residential property to a diplomatic use within the shaded area, thus helping to maintain the borough's housing stock.
 - 6.6.5 Option 1 has a potentially positive relationship with SA objective 16, whereby the residential character of shaded areas would be protected from the introduction of a quasi commercial element (e.g. embassy) and the associated activity, which can contribute towards the erosion of local distinctiveness and residential character of an area.
 - 6.6.6 It is not anticipated that the proposed policy would have a significant temporary effect, either positive or negative, on the SA objectives.
 - 6.6.7 The proposed policy has a positive relationship with the objectives it relates to and is therefore compliant with the SA objectives.
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7.0 An Engaging Public Realm

- 7.1 The Council will require servicing facilities to be well-designed, built to accommodate the demands of new development and sensitively integrated into the development and the surrounding townscape. In particular servicing activities should not give rise to traffic congestion, conflict with pedestrians or be detrimental to residential amenity. To this end, policy CR7 will be updated to make reference to coach facilities and public transport interchange as follows:

7.2 Policy CR7: Servicing

- 7.3 The Council will require servicing facilities **and coach parking** to be well designed, built to accommodate the demands of new development and sensitively integrated into the development and the surrounding townscape. In particular servicing activities **and coach pick-up and drop-off** should not give rise to traffic congestion, conflict with pedestrians or be detrimental to residential amenity. To deliver this the Council will:

- a. require sufficient on-site servicing space **and coach parking** to accommodate the number and type of vehicles likely to be generated and to ensure that this can take place without manoeuvring on the highway;
- b. require a Servicing Management Plan for all sites with on-site servicing space that will control the hours of servicing, including detail on how vehicles will be managed, and controls on the types and sizes of vehicles to ensure they are appropriate to the local area and are environmentally acceptable;
- c. **require coach drop-off and pick-up facilities and a Coach Management Plan at new hotel developments and at extensions to existing hotels;**
- d. require, where developments cannot provide onsite servicing space **or coach parking**, that it is demonstrated that the proposal can function satisfactorily without giving rise to adverse effects on traffic congestion, pedestrian safety, residential amenity or impact on bus routes. A Servicing Management Plan **and/or Coach Management Plan** will be required in these instances;
- e. require on-site servicing **and coach parking spaces** **space** and entrances to be sensitive to the character and appearance of the building and wider townscape and streetscape.

The appraisal of CR7 is contained in the table CR7/CT1.

8.0 Better Travel Choices

This chapter of the CS/Local Plan is concerned with ensuring that a range of transport uses are available, reducing dependency on the use of private cars. This ambition is articulated by the Strategic Objective CO3 which states that, “walking, cycling and public transport to be safe, easy, attractive and inclusive for all and preferred by residents and visitors to private car ownership and use.”

- 8.1.1 The policy review intends to make explicit reference to both off street coach parking facilities and to improving public transport interchanges within an amended policy **CT1**.

8.1.2 Coach parking.

The UDP extant policy TR20 currently resists the loss of off-street coach parking. This approach is considered essential to ease the congestion problems associated with inappropriate on-street coach parking. Reference to their protection will be added to **Policy CT1 (i)** which states,

“The Council will resist new public car parks **and the loss of off-street coach parking.**”

8.2 Public transport interchanges.

- 8.2.1 The Council recognises that during public transport journeys passengers often change between services or from one type of transport to another. Therefore, to encourage the use of public transport it is important that interchange is made as easy as possible. To this end the explicit reference to public transport interchanges currently made in the extant UDP policies TR16 and TR17 will be added to Core strategy **Policy CT1(j)** which states,

“The Council will ensure that new developments provide or contribute toward improvements to public transport services, access to them **and interchange between them.**”

TABLE CR7/CT1

SA OBJECTIVE	Option 1	Option 2	COMMENT
1. To conserve and enhance the natural environment and biodiversity.	X	X	Neither option has an obvious impact on the natural environment.
2. Reduce crime and anti-social behaviour and the fear of crime.	X	X	There is no correlation between the policy and this SA objective.
3. To support a diverse and vibrant local economy to foster sustainable economic growth.	X	X	There is no correlation between the policy and this SA objective.
4. Encourage social inclusion, equity, the promotion of equality and a respect for diversity.	X	X	There is no correlation between the policy and this SA objective.
5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables.	X	X	There is no correlation between the policy and this SA objective.
6. Reduce the risk of flooding to current and future residents.	X	X	There is no correlation between the policy and this SA objective.
7. Improve air quality in the Royal Borough.	+	-	Option 1 would reduce the frequency of coaches idling or manoeuvring into inappropriate on-street spaces contributing to emissions. Option 1 also ensures new development contributes towards public transport services and the interchange between them, making it easier to travel by different public transport modes and reducing reliance on the private car and improving air quality.
8. Protect and enhance the Royal Borough’s parks and open spaces.	X	X	There is no correlation between the policy and this SA objective.

9. Reduce pollution of air, water and land.	+	-	Option 1 would reduce the frequency of coaches idling or manoeuvring into inappropriate on-street spaces contributing to emissions. Option 1 also ensures new development contributes towards public transport services and the interchange between them, making it easier to travel by different public transport modes and reducing reliance on the private car and reducing air pollution.
9a. Prioritize development on previously developed land.	X	X	There is no correlation between the policy and this SA objective.
10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic.	+	-	Option 1 would reduce the frequency of coaches idling or manoeuvring into inappropriate on-street spaces which is time consuming and can cause traffic congestion. Option 1 also ensures new development contributes towards the interchange of public transport services making it easier to travel by different public transport modes, reducing reliance on the private car and encouraging the use of more sustainable forms of public transport.
11. Reduce the amount of waste produced and maximise the amount of waste that is recycled.	X	X	There is no correlation between the policy and this SA objective.
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.	X	X	There is no correlation between the policy and this SA objective.
13. To aim that the housing needs of the Royal Borough's residents are met.	X	X	There is no correlation between the policy and this SA objective.
14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials.	X	X	There is no correlation between the policy and this SA objective.

15. Ensure the provision of accessible health care for all Borough residents.	X	X	There is no correlation between the policy and this SA objective.
16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage.	X	X	There is no correlation between the policy and this SA objective.

8.3 Explanation of Table CR7/CT1

- 8.3.1 The options correlate to 3 of the 17 SA objectives. The proposed policy (Option 1) relates positively and no policy (Option 2) relates negatively to all 3. The proposed policy would have a positive impact upon air quality (SA objective 7) and pollution (SA objective 9) as it would require effective coach management plans and off street parking, resulting in fewer coaches having to idle, double park, or manoeuvre into parking spaces on the street where they would contribute to emission levels and traffic congestion.
- 8.3.2 Option 1 also ensures new development contributes towards the interchange between modes of public transport, making this form of travel as easy as possible and reducing reliance on the private car, thus reducing emissions. Similar reasons explain the positive relationship with SA objective 10. Option 1 resists the loss of off street coach parking thus reducing the frequency of coaches idling or manoeuvring into inappropriate on-street spaces which is time consuming and can cause traffic congestion. Option 1 also ensures new development contributes towards the interchange of public transport services making it easier to travel by different public transport modes, reducing reliance on the private car thereby promoting traffic reduction.
- 8.3.3 It is not anticipated that the proposed policy would have a significant temporary effect, either positive or negative, on the SA objectives.

9.0 Respecting Environmental Limits

- 9.1 This is a wide reaching chapter concerned with the implications of development on climate change, flooding, waste, biodiversity, air quality and noise and vibration. The strategic objective notes that development will, “contribute to the mitigation of, and adaption to, climate change; significantly reduce carbon dioxide emissions; maintain low and further reduce car use; carefully manage flood risk and waste; protect and attract biodiversity; improve air quality; and reduce and control noise within the Borough.”
- 9.2 In terms of policy, this chapter includes updates relating to climate change, biodiversity, noise and vibration and contaminated land.

9.3 Noise and vibration

9.3.1 The Council recognises that the dominant sources of noise in the Borough are generated by road and rail traffic and by building and construction activity. This is reflected by proposed **Policy CE6 (a)**, which states that

“The Council will carefully control the impact of noise and vibration generating sources which affect amenity, both during the construction and operational phases of development.” In addition the Council recognises that some development is characterised as being “noise sensitive”. Such development, which includes residential, is “located in the most appropriate location and wherever located, is protected against existing sources of noise and vibration.”

TABLE CE6

SA OBJECTIVE	Option 1	Option 2	COMMENT
1. To conserve and enhance the natural environment and biodiversity.	X	X	Neither option has an obvious impact on the natural environment.
2. Reduce crime and anti-social behaviour and the fear of crime.	+	X	Option 1 provides a more robust approach towards potential disturbance caused by noise and vibration which could be considered anti-social.
3. To support a diverse and vibrant local economy to foster sustainable economic growth.	X	X	There is no correlation between the policy and this SA objective.
4. Encourage social inclusion, equity, the promotion of equality and a respect for diversity.	X	X	There is no correlation between the policy and this SA objective.
5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables.	X	X	There is no correlation between the policy and this SA objective.
6. Reduce the risk of flooding to current and future residents.	X	X	There is no correlation between the policy and this SA objective.
7. Improve air quality in the Royal Borough.	X	X	There is no correlation between the policy and this SA objective.

8. Protect and enhance the Royal Borough's parks and open spaces.	X	X	There is no correlation between the policy and this SA objective.
9. Reduce pollution of air, water and land.	X	X	There is no correlation between the policy and this SA objective.
9a. Prioritize development on previously developed land.	X	X	There is no correlation between the policy and this SA objective.
10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic.	X	X	There is no correlation between the policy and this SA objective.
11. Reduce the amount of waste produced and maximise the amount of waste that is recycled.	X	X	There is no correlation between the policy and this SA objective.
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.	X	X	There is no correlation between the policy and this SA objective.
13. To aim that the housing needs of the Royal Borough's residents are met.	X	X	There is no correlation between the policy and this SA objective.
14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials.	X	X	There is no correlation between the policy and this SA objective.
15. Ensure the provision of accessible health care for all Borough residents.	X	X	There is no correlation between the policy and this SA objective.
16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage.	X/+	X	Option 1 provides a more robust approach towards potential disturbance caused by noise and vibration which could be considered harmful to the quality of the local environment.

9.3.2 Option 1 has a positive relationship with SA objective 2 and a potential positive relationship with SA objective 16, as it provides a more robust approach when assessing the potential for disturbance caused by noise and vibration which could be considered harmful to the quality of the local environment.

9.3.3 It is not anticipated that the proposed policy would have a significant temporary effect, either positive or negative, on the SA objectives.

9.4 Contaminated land

9.4.1 Policies PU3 and PU4 considered potentially contaminated land and how it should be addressed when determining a planning application. Given the largely residential history of much of the Borough, only a small part of the Borough is likely to be contaminated. However, there is a legacy of industry in some areas, and therefore care must be taken to ensure that potential contamination is appropriately addressed.

9.4.2 A new **Policy CE7** sets out the process needed to ensure that the potential risks of contaminated land are considered and that any contamination is adequately mitigated before development proceeds. To deliver this the Council will,

a) “require the reports and investigations shown in criteria (b) to (e) to be carried out by a competent person

b) Require a desk top study and preliminary risk assessment

c) Require a site investigation and detailed risk assessment in line with current best practice guidance

d) Require a remediation strategy that sets out how any identified risks from the reports above are going to be addressed

e) Require a validation report once remediation has taken place.”

TABLE CE7

SA OBJECTIVE	Option 1	Option 2	COMMENT
1. To conserve and enhance the natural environment and biodiversity.	+	X	This policy ensures the consideration of measures to deal with contaminated land and mitigating risks before development proceeds. This will contribute towards enhancing the natural and local environment.
2. Reduce crime and anti-social behaviour and the fear of crime.	X	X	There is no correlation between the policy and this SA objective.

3. To support a diverse and vibrant local economy to foster sustainable economic growth.	X	X	There is no correlation between the policy and this SA objective.
4. Encourage social inclusion, equity, the promotion of equality and a respect for diversity.	X	X	There is no correlation between the policy and this SA objective.
5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables.	X	X	There is no correlation between the policy and this SA objective.
6. Reduce the risk of flooding to current and future residents.	X	X	There is no correlation between the policy and this SA objective.
7. Improve air quality in the Royal Borough.	X	X	There is no correlation between the policy and this SA objective.
8. Protect and enhance the Royal Borough's parks and open spaces.	X	X	There is no correlation between the policy and this SA objective.
9. Reduce pollution of air, water and land.	+	X	This policy ensures the consideration of measures to deal with contaminated land and mitigating risks before development proceeds. This will contribute towards enhancing the natural and local environment by reducing the pollution of land where possible.
9a. Prioritize development on previously developed land.	+	X	Remediated land could be redeveloped to different uses.
10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic.	X	X	There is no correlation between the policy and this SA objective.
11. Reduce the amount of waste produced and maximise the amount of waste that is recycled.	X	X	There is no correlation between the policy and this SA objective.

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.	X	X	There is no correlation between the policy and this SA objective.
13. To aim that the housing needs of the Royal Borough's residents are met.	X	X	There is no correlation between the policy and this SA objective.
14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials.	X	X	There is no correlation between the policy and this SA objective.
15. Ensure the provision of accessible health care for all Borough residents.	X	X	There is no correlation between the policy and this SA objective.
16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage.	+	X	This policy ensures the consideration of measures to deal with contaminated land and mitigating risks before development proceeds. This will contribute towards enhancing the natural and local environmental quality by reducing the pollution of land where possible.

9.5 Explanation of Table CE7

9.5.1 The proposed policy has a positive relationship with SA objectives 1, 9, and 16. This policy requires the consideration of measures to deal with contaminated land and mitigating risks before development proceeds. This will contribute towards enhancing the natural and local environment, enhancing open spaces and the natural environment where possible.

9.6 Updated wording of Policy CE1

9.6.1 The new BREEAM for Domestic Refurbishment was launched on 11 June 2012 and has replaced EcoHomes as the method for assessing the environmental performance of refurbishment projects. In light of this, as part of the partial review of the Core Strategy, the Council is undertaking work to establish suitable BREEAM for Domestic Refurbishment targets to replace the EcoHomes targets. The draft policy

requires BREEAM domestic refurbishment 'very good' subject to certain criteria and has been reworded as follows:

Policy CE 1

Climate Change

The Council recognises the Government's targets to reduce national carbon dioxide emissions by 26% against 1990 levels by 2020 in order to meet a 60% reduction by 2050 and will require development to make a significant contribution towards this target.

To deliver this the Council will:

a. require an assessment to demonstrate that all new buildings and extensions of 800m² or more residential development or 1,000m² or more non-residential achieve the following Code for Sustainable Homes / BREEAM standards:

i. Residential Development: **should meet** Code for Sustainable Homes **Level 4**.

Up to 2012: Level Four; and seek to achieve:

2013 to 2015: Level Five;

2016 onwards: Level Six.

ii. Non Residential Development **should meet Relevant BREEAM Assessment very good with 60% of the unweighted credits available in the energy, water and materials sections.**

Up to 2015: Excellent; and seek to achieve:

2016 onwards: Outstanding;

b. require an assessment to demonstrate that conversions and refurbishments of 800m² or more residential development or 1,000m² or more non-residential achieve the following relevant BREEAM standards:

i. Residential Development: **EcoHomes Very Good (at design and post construction) with 40% of credits achieved under the Energy, Water and Materials sections, or comparable when BREEAM for refurbishment is published; BREEAM excellent for Domestic Refurbishment including the following minimum standards:**

(a) the minimum standards of excellent for Energy;

(b) 80% or more of the un-weighted credits in the waste category

ii. Non Residential Development: **should achieve BREEAM very good rating.**

Up to 2015: Very Good (with 40% of credits achieved under the Energy, Water and Materials sections); and seek to achieve:

2016 onwards: Excellent (with 40% of credits achieved under the Energy, Water and Materials sections);

9.6.2 The changes to the above policy incorporate the requirements of the recently published BREEAM for Domestic Refurbishment standards. They do not alter the policy to the degree that the aims or consequences are different. Therefore this update to the wording of CE1 does not warrant an appraisal against the objectives, the appraisal of the original policy under the SA for the Core Strategy is considered sufficient.

9.7 Updated wording of CE4

Policy CE4 has been updated to make reference to biodiversity and ecosystem targets. This change does not alter the policy to the degree that a new appraisal against the SA objectives is required.

10.0 Strategic Objectives

10.1 The NPPF emphasises the need for planning to promote the economy. To reflect this emphasis Strategic Policy CP3 has been amended to state that,

“The Council will protect, promote and enhance the local distinctiveness **and economic success** of the Places of the Borough, and improve their character and quality and the way they function.”

Table CP3

SA OBJECTIVE	Option 1	Option 2	COMMENT
1. To conserve and enhance the natural environment and biodiversity.	X	X	There is no correlation between the policy and this SA objective.
2. Reduce crime and anti-social behaviour and the fear of crime.	X	X	There is no correlation between the policy and this SA objective.
3. To support a diverse and vibrant local economy to foster sustainable economic growth.	+	X	The amended policy specifies the support of the economic success of the Places of the Borough.
4. Encourage social inclusion, equity, the promotion of equality and a respect for diversity.	X	X	There is no correlation between the policy and this SA objective.
5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables.	X	X	There is no correlation between the policy and this SA objective.
6. Reduce the risk of flooding to current and future residents.	X	X	There is no correlation between the policy and this SA objective.

7. Improve air quality in the Royal Borough.	X	X	There is no correlation between the policy and this SA objective.
8. Protect and enhance the Royal Borough's parks and open spaces.	X	X	There is no correlation between the policy and this SA objective.
9. Reduce pollution of air, water and land.	X	X	There is no correlation between the policy and this SA objective.
9a. Prioritize development on previously developed land.	X	X	There is no correlation between the policy and this SA objective.
10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic.	X	X	There is no correlation between the policy and this SA objective.
11. Reduce the amount of waste produced and maximise the amount of waste that is recycled.	X	X	There is no correlation between the policy and this SA objective.
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.	X	X	There is no correlation between the policy and this SA objective.
13. To aim that the housing needs of the Royal Borough's residents are met.	X	X	There is no correlation between the policy and this SA objective.
14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials.	X	X	There is no correlation between the policy and this SA objective.
15. Ensure the provision of accessible health care for all Borough residents.	X	X	There is no correlation between the policy and this SA objective.

16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage.	X	X	There is no correlation between the policy and this SA objective.
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10.1.1 Explanation of Table CP3.

This is change to this policy relates to the economic success of the Places of the borough and this relates positively to SA objective 2 only.

- 10.2 In addition a third policy has been added to correct the original omission of a strategic policy linked to the Borough's central vision. A policy has been added which reflects the need to safeguard the existing townscape and mix of uses which uphold the Borough's residential quality of life.

Policy CP4

Quality

The Council will safeguard the existing high quality townscape and finely grained mix of uses to uphold the residential quality of life."

Table CP4

SA OBJECTIVE	Option 1	Option 2	COMMENT
1. To conserve and enhance the natural environment and biodiversity.	X	X	There is no correlation between the policy and this SA objective.
2. Reduce crime and anti-social behaviour and the fear of crime.	X	X	There is no correlation between the policy and this SA objective.
3. To support a diverse and vibrant local economy to foster sustainable economic growth.	X	X	The amended policy specifies the support of the economic success of the Places of the Borough.
4. Encourage social inclusion, equity, the promotion of equality and a respect for diversity.	X	X	There is no correlation between the policy and this SA objective.
5. Minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables.	X	X	There is no correlation between the policy and this SA objective.

6. Reduce the risk of flooding to current and future residents.	X	X	There is no correlation between the policy and this SA objective.
7. Improve air quality in the Royal Borough.	X	X	There is no correlation between the policy and this SA objective.
8. Protect and enhance the Royal Borough's parks and open spaces.	X	X	There is no correlation between the policy and this SA objective.
9. Reduce pollution of air, water and land.	X	X	There is no correlation between the policy and this SA objective.
9a. Prioritize development on previously developed land.	X	X	There is no correlation between the policy and this SA objective.
10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic.	X	X	There is no correlation between the policy and this SA objective.
11. Reduce the amount of waste produced and maximise the amount of waste that is recycled.	X	X	There is no correlation between the policy and this SA objective.
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.	X	X	There is no correlation between the policy and this SA objective.
13. To aim that the housing needs of the Royal Borough's residents are met.	X	X	There is no correlation between the policy and this SA objective.
14. Encourage energy efficiency through building design to maximise the re-use of buildings and the recycling of building materials.	X	X	There is no correlation between the policy and this SA objective.
15. Ensure the provision of accessible health care for all Borough residents.	X	X	There is no correlation between the policy and this SA objective.

16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage.	+	X	CP4 is a new policy which specifically safeguards the existing high quality townscape and finely grained mix of uses (which comprises local environmental quality and amenity) to uphold residential quality of life.
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10.2.1 Explanation of Table CP4

This policy relates to only SA objective 16. As it seeks to safeguard the existing high quality townscape and finely grained mix of uses to uphold residential quality of life it has a positive relationship with this objective.

11.0 Preferred option

- 11.1 The adoption of Option 1 in each instance is recommended as the preferred option as this would allow the Council to further protect residential amenity, control traffic generation and the impact upon the highway, as well as dealing with contaminated land issues. No significant negative impacts should arise as a consequence of incorporating these policies into the CS/Local Plan.
- 11.2 These policies have a predominantly positive relationship with the SA objectives. The appraisal process has not suggested that any of the preferred policies are likely to have any significant negative effect on the SA objectives.
- 11.3 It has been identified during the appraisal exercise that the adoption of Option 1 for CF9 could have a potentially negative impact upon the economic growth of the borough by resisting hotels in certain circumstances. However, this impact would not be anticipated to be of such a scale as to be harmful.

12.0 Mitigation and Monitoring

- 12.1 The significant sustainability effects of implementing the policy must be monitored to identify unforeseen adverse effects and to be able to undertake appropriate remedial action (SEA Directive).
- 12.2 A monitoring framework was developed for the LDF as a whole but sufficient information about the effects of the above policies needs to be provided for.
- 12.3 The following indices (Table 12) might be collected to assist with monitoring.

Table 12: Proposed Monitoring Data

INDICATORS
Housing trajectory.
Number of anti-social behaviour complaints.
Number of applications related to proposed loss of C3 to C1, and the outcome of any appeals.
Number of applications related to proposed diplomatic uses in resisted areas and the outcome of any appeals.
Number of complaints to Environmental Health on amenity relating to noise and vibration arising from construction and plant
Number of complaints to Highways about traffic congestion
Outcome of applications involving contaminated land.

In terms of mitigation measures, the only potential negative relationship exists between two of the policies and the SA objective for economic growth. This negative relationship is not considered significantly strong and as such the potential long term impact is expected to be negligible. In any case, it should be noted that the core strategy contains other policies which promotes economic growth and their long term positive impact would outweigh the negative in this situation.

13.0 Conclusions

- 13.1 The preferred Option 1 in each case will successfully bring all of the relevant policies into a single document (and ultimately allow for the deletion of the entire UDP) along with a number of minor changes which are intended to bring the supporting text up to date. In addition, the Core Policies have been amended to reflect the thrust within the NPPF to support economic growth and to correct the original omission of a strategic policy linked to the Borough's central vision.
- 13.2 It should be noted that these amendments are not intended to alter the meaning of the UDP policies, nor the meaning of the plan taken as a whole.
- 13.3 It is concluded that this opportunity to appraise the extant policies before incorporating them into the Local Plan has been an effective way of fulfilling the legislative requirements and ensuring they will continue to be effective alongside the CS policies throughout the lifetime of the Local Plan.