



THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA

New Local Plan Review Integrated Impact Assessment

Stage B - Interim IIA Report

Non-Technical Summary





The Royal Borough of Kensington and Chelsea

NEW LOCAL PLAN REVIEW INTEGRATED IMPACT ASSESSMENT

IIA Stage B: Interim IIA Report Non-Technical Summary

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1 INTRODUCTION

1.1 OVERVIEW

- 1.1.1. The Royal Borough of Kensington and Chelsea (RBKC) is currently preparing a New Local Plan Review (NLPR), which is a comprehensive review of the existing Local Plan, which was adopted in September 2019.
- 1.1.2. RBKC has commissioned WSP to undertake an Integrated Impact Assessment (IIA) which will ensure that sustainability aspects are incorporated into the NLPR. This Non-Technical Summary introduces the Interim IIA and summarises the contents of the full technical report.

1.2 THE NEW LOCAL PLAN REVIEW

- 1.2.1. The NLPR will set out the vision for future development in the Borough over a 20-year period.
- 1.2.2. RBKC adopted its current Local Plan in September 2019, which would normally mean that a NLPR would not be needed until 2024, however, following the Grenfell Tower tragedy RBKC made a clear commitment to its residents to change its approach on how they engage with the community on planning matters in the future and agreed an early review of the Local Plan.
- 1.2.3. RBKC have set an overall vision that reflects their ambitions and priorities for future development within the Borough. This vision for the Borough is set out below.

'The Local Plan will support good growth and future development in the Borough to be:

- **Inclusive.** *It will narrow the inequality which exists across the Borough, and ensure that we provide the truly affordable homes, the employment opportunities and access to a range of social and the sports/leisure facilities needed by all our residents;*
 - **Green.** *It will put the environment at the heart of all new development, so we can support the health and wellbeing of our residents and our visitors, now and long into the future;*
 - **Liveable.** *It will enhance the Borough's outstanding townscape, conserving the context where required and by ensuring that the design of new development is of the highest quality and safety standards, reinforcing an area's character; in addition to developing our cultural offer and supporting our internationally recognised town centres and their shops, theatres, museums, events, festivals and markets to create a highly desirable place to live'.*
- 1.2.4. The NLPR includes 60 policies (some of which have been saved from the previous local plan) and 15 strategic sites which require IIA Assessment. RBKC have also considered 11 alternative sites which have also been assessed as part of the IIA.

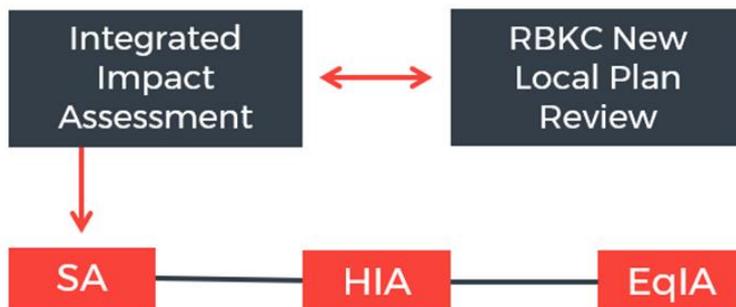
2 IIA METHODOLOGY

2.1 WHAT IS IIA?

2.1.1. The IIA combines the following assessment processes:

- Sustainability Appraisal (SA);
- Health Impact Assessment (HIA); and
- Equalities Impact Assessment (EqIA).

Figure 2-1 - Integrated Impact Assessment



2.1.2. An integrated assessment approach enables synergies and cross-cutting impacts to be identified and avoids the need to undertake and report on separate assessments and seeks to reduce any duplication of assessment work. A single process can improve efficiencies in the assessment itself, as many of the issues covered in the different forms of assessment overlap. This process also helps to simplify outcomes and recommendations for policymakers.

2.1.3. Each component of the assessment has been described below:

- **SA:** The SA process is carried out during the preparation of local plans and spatial development strategies. Its role is to promote sustainable development by assessing the extent to which emerging plans will help to achieve relevant environmental, economic and social objectives.
- **EqIA:** The EqIA process focuses on assessing and recording the likely equalities effects as a result of a policy, project or plan. It seeks to ensure that the policy, project or plan does not discriminate or disadvantage people and enables consideration of how equality can be improved or promoted. The equality duty came into force in April 2011 and covers the following nine Personal Protected Characteristics:
 - Age;
 - Disability;
 - Gender;
 - Gender reassignment;
 - Marriage and civil partnership;
 - Pregnancy and maternity;
 - Race;
 - Religion or belief; and

- Sexual orientation.
- **HIA:** The HIA process is used to identify the likely health effects of plans, policies or developments and to implement measures to avoid negative impacts and promote opportunities to maximise the benefits. There is no formally adopted methodology for HIA although there is a body of practice and guidance at a policy level.

2.2 IIA METHODOLOGY

- 2.2.1. IIA is an iterative process of gathering data and evidence, assessment of environmental effects, developing mitigation measures and making recommendations to refine plans or programmes in view of the predicted environmental effects.
- 2.2.2. The key stages of the IIA process are the following:
- **Stage A:** Production of a scoping report which sets the context of the local plan, identified other relevant policies, plans and programmes, baseline information and sustainability objectives. This was undertaken by RBKC in summer 2021.
 - **Stage B (this stage):** Assessment of draft policies and alternative policies and strategic and alternative sites and the preparation of the IIA Interim Report. HIA and EqIA assessments are undertaken at the same time and the findings incorporated into the IIA Interim Report. The report is then consulted on alongside the draft Local Plan (also referred to as Regulation 18 consultation);
 - **Stage C:** Assessment of preferred policies and sites and the preparation the IIA Report. HIA and EqIA assessments are undertaken at the same time and the findings incorporated into the IIA Report;
 - **Stage D:** Consultation on the preferred Local Plan and the IIA Report (also referred to as Regulation 19 consultation). The Local Plan and IIA then undergo independent examination; and
 - **Stage E:** Monitoring the significant effects of implementing the Local Plan.
- 2.2.3. Full details on the methodology can be found in **Section 3** of the IIA Interim Report.

3 IDENTIFYING SUSTAINABILITY ISSUES AND OPPORTUNITIES

- 3.1.1. In July 2021, RBKC drafted the IIA Scoping Report, which outlined key baseline information, identified the key issues for sustainability in Borough and identified the future trends which could occur without implementation of the Local Plan.
- 3.1.2. Following the findings identified at scoping an IIA Appraisal Framework has been produced, which was used to guide the assessment process of the plans and strategies. This Appraisal Framework has guided the IIA assessment of the Local Plan.

Table 3-1 – IIA Appraisal Framework

IIA Objective
1. To conserve and enhance the natural environment and biodiversity and create new spaces for nature.
2. To reduce crime and anti-social behaviour and the fear of crime, and ensure that everyone feels safe
3. To support a diverse and vibrant local economy to foster sustainable economic growth and support the Borough’s town centres
4. To build inclusive communities by reducing social exclusion, promoting equity and equality and respecting diversity
5. To minimise effects on climate change through reduction in emissions, and adoption measures to adapt and build resilience to climate change
6. To reduce the risk of flooding to current and future residents
7. To improve air quality in the Borough
8. To protect and enhance the Borough’s parks and open spaces
9. To protect and enhance water and land resources, including quality
10. To promote traffic reduction and encourage more sustainable alternative forms of transport
11. To reduce the amount of waste produced and minimise the amount sent to landfill
12. To enhance, protect and increase community facilities and services
13. To meet the housing needs of all Borough’s residents inclusively
14. To maximise the re-use of buildings and the recycling of building materials
15. To improve health and wellbeing for all borough residents
16. To conserve and enhance sites, features and areas of historical, archaeological, and cultural heritage value, local distinctiveness and townscape quality
17. To reduce the use of energy, minimise reliance on fossil fuels, and encourage energy efficiency.

4 IIA ASSESSMENT FINDINGS

4.1 IIA ASSESSMENT

ASSESSMENT OF DRAFT NLPR POLICIES

- 4.1.1. The assessment of the draft NLPR policies was carried out in relation to the IIA Objectives. A summary of the findings is detailed in **Table 4-1** below.
- 4.1.2. Further details on the assessment of the draft NLPR policies can be found within **Section 5.4** of the main IIA Report and **Appendix C** to the main IIA Report.

Table 4-1 – Assessment of NLPR Policies

IIA Objective	Significant Assessment Findings
IIA1: Biodiversity	<p>Policies have resulted in mainly positive effects, most notable of which are policies which protect and enhance open, green spaces and trees with high ecological value, and policies which promote the use of green infrastructure which can provide opportunities to increase biodiversity and improve habitat connectivity within the Borough. Significant positive effects on biodiversity will also result from policies G6 to G10 where construction and operation impacts (air, noise, lighting, and odour) of developments will be reduced.</p> <p>Uncertain effects were identified for housing policies (HO1 – HO7). The development of new housing may result in negative effects to due to a potential in land take requirements and construction effects which can cause disturbances on neighbouring habitats. However, these effects will depend on the type of development that comes forward, but they are likely to be temporary and mitigated through project level design and delivery.</p>
IIA2: Crime and Safety	<p>Significant positive effects were identified for policy CD2 where proposals are required to be secure and design out crime. Policies that support landscape and public realm improvements are also likely to help to reduce crime and create a safer community.</p>
IIA3: Economy	<p>Policies that support housing provisions within the Borough (HO1 – HO7) will help to improve connectivity between employment centres and the housing market and increase spending within the local community. Policies which help to improve the Borough's townscape and landscape and support the retention and improvements to the Borough's heritage assets, will likely attract further inward investments and tourism opportunities. Protecting existing employment space and meeting the local needs for office floorspace and employment zones within the Borough, as part of policies BC1 to BC3, will also help to improve job availability.</p>
IIA4: Inclusion and Equality	<p>Policies that promote a 'walkable neighbourhood' and improve connectivity inclusively (TC1, T1, T4 and T5) will allow residents to live their lives more locally, allowing them to access facilities and services without the need for the use of the private car. Further significant effects will result from the implementation of policy SI1 where social and community uses are protected and provision of new facilities that are accessible and inclusive are supported.</p>

IIA Objective	Significant Assessment Findings
	<p>Policies HO3 to HO6 and HO8 ensure that the type and size of housing delivered will reflect the varying local needs of the Borough, allowing more people the chance to live in appropriate housing.</p>
<p>IIA5: Climate Change</p>	<p>Significant positive effects will result from policies that help to reduce carbon (G1 to G5), promote sustainable design principles (CD2), and promote sustainable transport (TC1, T1, T4, T5, T8). Further significant positive effects will result from policies that help to reduce flood risk (G11 to G13 and G14 to G17).</p> <p>Uncertainties have been identified for policies which support the development of new housing and town centres where negative effects on climate change can occur from construction and operation effects (air, noise, light, and odour pollution). However, these effects will depend on the type of development that comes forward, but they are likely to be temporary and mitigated through project level design and delivery.</p>
<p>IIA6: Flooding</p>	<p>Policies G11 to G14 help to significantly reduce flood risk through the introduction of SuDs and green infrastructure and requiring developments in high flood risk areas (flood zones 2 and 3 and Critical Drainage Areas) to produce flood risk assessments.</p> <p>Uncertainties have been identified for policies which support the development of new housing and town centres where negative effects on flooding can occur from the introduction of more hardstanding surfaces. However, these effects will depend on the type of development that comes forward and mitigated through project level design and delivery.</p>
<p>IIA7: Air Quality</p>	<p>Significant positive effects will result from policies that directly improve air quality; policy G6 requires new developments to be undertaken in ways that minimise impact on air quality and mitigate any exceedances that occur, and policy G7 helps to improve construction and operation impacts on air quality.</p> <p>Uncertainties have been identified for policies which support the development of new housing and town centres where negative effects on air quality can occur from construction and operation effects. However, these effects will depend on the type of development that comes forward, but they are likely to be temporary and mitigated through project level design and delivery.</p>
<p>IIA8: Open Spaces</p>	<p>Policies G12 to G15, and CD6 support the protection of existing parks, gardens and open spaces (including registered parks and gardens) and require new development, such as the Earls Court Opportunity Areas, to provide new high quality outdoor spaces, which will significantly benefit the open space offering within the Borough.</p> <p>Minor positive effects will result from the development of new homes and townscape improvements, where enhancements to the public realm are likely to occur.</p>
<p>IIA9: Water and Land Resources</p>	<p>Policies which incorporate circular economy principles (G1, G18, and G19) and promote the use of retaining and improving existing buildings before developing new (G1, G18, TC1, G6 and HO7) will help to reduce the use of finite natural resources.</p> <p>Pollution risks to land and water bodies from new development will be controlled and if required, mitigated against as a result of policy G19. This will have significant beneficial effects the Borough's quality of water bodies and land resources.</p>

IIA Objective	Significant Assessment Findings
	<p>Further significant benefits to water quality will occur from the implementation of policy G13. Water and sewage infrastructure provisions needed within the Borough, will be supported by RBKC, and commercial development will need to achieve BREEAM 'excellent' in the water category. As part of this policy, the water quality in the Thames and Grand Union Canal will also be improved by controlling permanently moored vessels.</p>
IIA10: Sustainable Transport	<p>Policies that promote a 'walkable neighbourhood' and improve connectivity inclusively by giving priority to pedestrian and cyclists (TC1, T1, T4, and T5) will allow residents to live their lives more locally, allowing them to access facilities and services without the need for the use of the private car, therefore encouraging the use of sustainable transport modes. As part of policy T8, EV charging provisions within new development will be made, encouraging the use of electric vehicles.</p>
IIA11: Waste	<p>Policies that consider proposals for retaining and improving existing buildings first before development and implementing circular design principles (principles that design out waste and pollution, by keeping products and materials in use for as long as possible) (G1, G18, TC1 and HO7) will help to reduce waste from demolition and rebuilding. Waste management policy, G18, will further benefit IIA11 by requiring all new major development, such as Kensal Canalside and Earl's Court, to prepare and implement Site Waste Management Plans and requires all developments to reuse, recycle or recover 95% of construction and demolition waste, and 95% of excavation waste put to beneficial use. As well as this, all new development will need to provide internal and external well designed, and accessible waste and recycling (including food) storage space which will help to encourage more people to recycle and reduce waste.</p>
IIA12: Community Facilities	<p>Policies which help to improve connectivity to community facilities and services (TC1, CD1, T1, T4 and T5) will result in significant positive effects due to improved access to these facilities and services. Policy SI1 also resulted in significant positive effects by ensuring that social and community uses are protected and/or enhanced throughout the Borough and will support the provision of new facilities.</p> <p>Uncertain effects have been identified for housing policies (HO1-HO8). There will be an increased demand for healthcare, schools, and community facilities from the new populations, which may put additional pressures on these services. However, these effects will depend on the type of development that come forward and whether community facilities will be provided as part of new development.</p>
IIA13: Housing	<p>Significant positive effects on housing will result from policies HO1 to HO8 which help to provide new and retain existing housing to meet and hopefully exceed London Plan targets of 4,480 over ten years in the Borough. These policies will also ensure that the type and size of housing delivered will reflect the varying local needs of the Borough, by providing more community housing and protecting and improving the existing Travellers' site at Stable Way.</p>
IIA14: Re-Use and Recycling	<p>Policies that consider proposals for retaining and improving existing buildings first before development and implementing circular design principles (G1, G18, TC1 and HO7) will help to reduce waste from demolition and rebuilding and promote reuse and recycling. Waste management policy, G18, will further benefit IIA14 by requiring all new major development, such as Kensal Canalside and Earl's Court, to prepare and implement Site Waste Management Plans and</p>

IIA Objective	Significant Assessment Findings
	<p>requires all developments to reuse, recycle or recover 95% of construction and demolition waste, and 95% of excavation waste put to beneficial use. As well as this, all new development will need to provide internal and external well designed, and accessible waste and recycling (including food) storage space which will help to encourage more people to recycle.</p>
<p>IIA15: Health and Wellbeing</p>	<p>Significant positive effects will result on policies which help to promote an active lifestyle through improving access to and supporting development of open spaces and community facilities and services, without the need for the use of the private car. The promotion of an active lifestyle will provide benefits to both the physical and mental wellbeing of the population in the Borough.</p> <p>Policies which help to improve air quality will also result in significant positive effects on IIA15, primarily policy G6 which requires new developments to be undertaken in ways that minimise impact on air quality and mitigate any exceedances. Policies G11 to G17 will also help to improve air quality through the protection and provision of more open green space and trees, and the introduction of green infrastructure and Sustainable Urban Drainage Systems (SuDS).</p> <p>As housing is a social determinant of health, policies HO3 to HO6, HO8, CD7 and CD8 will also result in significant positive effects on health and wellbeing. These policies ensure that the type and size of housing delivered reflects the varying local needs of the Borough by providing more community housing and protecting and improving the existing Travellers' site at Stable Way. This will ensure more people get the chance to live in appropriate housing and therefore, helping to improve their health and wellbeing.</p>
<p>IIA16: Historic Environment</p>	<p>Significant positive effects on IIA16 will result due to policies that seek to maintain and enhance the Borough's character and distinctiveness at the same time as improving the quality of the Borough's built environment by ensuring that heritage assets in the Borough, including Conservation areas, listed buildings, scheduled monuments, archaeology, and registered parks and gardens, are protected or enhanced from development (CD1 to CD4c). Policies G15 and G17 will also result in significant positive effects due to resisting development that has adverse effect upon Conservation Areas, Metropolitan Open Land, and Registered Parks and Gardens, and protecting trees with amenity and historic value. Further significant positive effects have been identified for T4 which aims to retain, and seek the maintenance and repair of, historic street furniture such as post boxes and historic telephone kiosks.</p> <p>Uncertainties have been identified for policies which support the development of new housing and town centres where negative effects on the historic environment can occur from construction and operation effects (noise and air pollution). However, these effects will depend on the type of development that comes forward, but they are likely to be temporary and mitigated through project level design and delivery.</p>
<p>IIA17: Energy</p>	<p>Significant positive effects on IIA17 will result due to policies that support the aim of the Borough becoming net zero carbon by 2040 through the promotion of low carbon and energy efficient design. Policies G1 and G2 support the introduction of circular economy principles (principles that design out waste and pollution, by keeping products and materials in use for as long as possible), policies G4 and G5 support the sustainable retrofitting of glazed windows and solar panels and help to reduce reliance on air conditioning, and policy G14 supports the use of green infrastructure.</p>

IIA Objective	Significant Assessment Findings
	Uncertain effects have been identified as a result of housing policies due to the potential increased demand on energy usages, however this will depend on the type of development which come forward and if any energy efficient designs are included.

ASSESSMENT OF POLICY ALTERNATIVES VS DRAFT NLPR POLICIES

A summary of the performance of policy alternatives compared to the draft NLPR policies has been provided below:

- In general, the assessment of policy alternatives has resulted in a greater level of uncertainty, less significant positive effects and more negative effects than the proposed draft policies. These effects have often arisen either where there is no proposed policy, or the London Plan policies have been applied.
- Existing Local Plan policies have performed well, however, these have often failed to achieve significant positive effects as these policies are slightly outdated or do not apply the same level of detail that the NLPR draft policies provide.
- The policy alternatives for the homes theme have resulted in the greatest level of uncertainty, due to the lack of detail surrounding scheme level designs and the types of developments that could come forward.
- The gypsy and traveller alternative policy may well help to safeguard the existing site; however, it won't help the site to grow, which could be pertinent given that there is an ongoing waiting list at the Stable Way site. This could socially exclude gypsy and traveller population and has resulted in significant negative effects for IIA4 and IIA13. This differs from the proposed policy for gypsies and travellers which has performed well.
- Significant negative effects have been identified in relation to Land Use and Transport policy alternative, specifically on IIA4 (social inclusion and equality) and IA10 (sustainable transport). Providing no alternative policy for land use and transport could result in the potential reduction in accessibility of sustainable transport modes.
- Blue – Green Future alternative policies have still resulted in significant positive effects on a number of IIA objectives (IIA14 – Re-use and recycling, IIA7 – Air quality, IIA9 – Water and land resources, IIA17 – Energy), however, these effects are reduced compared to the NLPR draft policies. This is often due to the policy alternative being the London Plan. Although the London Plan does provide suitable alternatives, these policies lack the local detail of the local planning policies and have resulted in more minor positive effects.
- The policy alternative for Biodiversity, has resulted in uncertain effects for IIA1 (biodiversity) due to the lack of detail on scheme level design and types of developments could come forward. The introduction of the biodiversity enhancements for major developments in line with the London Plan 2021 will help to improve biodiversity, however, not including minor developments within this policy may lead to missing opportunities to increase biodiversity within the Borough.
- Effects upon the IIA objectives as a result of Policy the Tall Buildings alternative are predominantly uncertain. Although this option contains certain requirements for the development of tall buildings (e.g. design standards and integration to the local environment), it does not specify appropriate locations for tall buildings. There is therefore the potential for such

developments to have either positive or negative effects upon many of the IIA objectives such as areas important for biodiversity (IIA1) or heritage (IIA15), water resources (IIA9), flood risk (IIA6) and open spaces (IIA8), depending upon where they are sited.

- No policy on light pollution may have negative effects on the natural environment and amenity value within the Borough due to light spill and glare, which can cause disturbance to biodiversity (IIA1) and the setting of historic assets (IIA16). Light spill and glare can also disturb residents living near to these highly light areas (i.e. sleeping patterns), which may lead to negative impacts on their physical and mental wellbeing.

4.1.3. Further details on the assessment of alternative sites can be found in **Section 5.5** of the main IIA Report and **Appendix D** to the main IIA Report.

ASSESSMENT OF STRATEGIC SITES

4.1.4. The assessment of Strategic Sites was carried out in relation to the IIA Objectives. A summary of the findings is detailed in **Table 4-2** below.

4.1.5. Further details on the assessment of strategic sites can be found within **Section 6.3** of the main IIA Report and **Appendix B** to the main IIA Report.

Table 4-2 – Assessment of Strategic Sites

IIA Objective	Significant Assessment Findings
IIA1: Biodiversity	Sites located near Priority Habitats, Local Nature Reserves or other non-designated open spaces have the potential to cause short term negative impacts on biodiversity. This is owing to potential noise impacts and reduced air quality.
IIA2: Crime and Safety	The impact of the site allocations on crime and safety will be determined by local policy and the final design of the developments. At this stage, therefore, the sites have uncertain impacts on IIA2.
IIA3: Economy	The majority of the sites have positive impacts on IIA3 as they bring local residents closer to local job opportunities. In the case of sites where commercial or retail units exist, there will be disruption to businesses that are already present during construction of the scheme. Businesses may be forced to close or relocate which would have negative impacts.
IIA4: Inclusion and Equality	The impacts on IIA4 are influenced by the provision of community facilities in the area, as well as the type of housing (for example, care homes, homes for key workers). The majority of sites had positive impacts for IIA4 as they were located near existing services or had plans for the provision of new services which would help to reduce isolation and foster inclusion.
IIA5: Climate Change	The impact of the site allocations on climate change is more likely to be determined by policy and the final design details of the development. For this reason, uncertain impacts on IIA5 have been identified at this stage.
IIA6: Flooding	For most of the sites, the impact on IIA6 is negligible as they are not located near a Flood Zone and will have minimal impact on flood risk. Some sites are located within Flood Zone 3 (areas of land that has a 1 in 100 or greater chance of flooding each year from river), therefore design will need to consider potential flood risk impacts on residents and nearby structures, and how these can be mitigated.

IIA Objective	Significant Assessment Findings
IIA7: Air Quality	The majority of the sites will have temporary negative impacts on air quality during construction, as dust can be released into the surrounding area. Most of the developments will also have positive impacts as they are located near public transport facilities which will encourage alternative forms of transport and improve air quality in the Borough.
IIA8: Open Spaces	This objective was based on proximity to existing open space, and whether any additional open space was proposed as part of the scheme. Where schemes will include the provision of additional open space, such as Kensal Canalside, Edenham Way and Chelsea Farmer's Market, significant positive effects have been identified for IIA8.
IIA9: Water and Land Resources	For the majority of sites, there are uncertain impacts for IIA9. This is because this is affected more by policy than by housing allocation. The site at 142A Highlever Road and Lots Road South has been highlighted as having minor negative impacts due to their current uses as a vehicle repair shop and a power station respectively. Therefore there may be some ground remediation needed before development can commence.
IIA10: Sustainable Transport	For sites with existing good access to public transport, minor positive effects have been identified. Where improvements to the transport infrastructure are proposed, for example at Earl's Court Exhibition Centre, these effects are significant positive. In some cases, such as 142A Highlever Road, existing access to public transport is poor, so many people may be discouraged from using it, hence negative impacts for these sites.
IIA11: Waste	For this objective, uncertain impacts have been identified at all the sites. This is because waste management strategies are more likely to be determined by policy than by site allocations.
IIA12: Community Facilities	This was well scored throughout the appraisal as all the sites have good access to local facilities. In cases where new community facilities were proposed as part of the development, significant positive impacts have been identified.
IIA13: Housing	The majority of sites have significant positive impacts for IIA13. In cases where the development is on a smaller scaler, minor positive impacts have been identified.
IIA14: Re-Use and Recycling	For each of the sites it is unclear whether building materials will be re-used or recycled, therefore uncertain impacts have been identified for IIA14. This is also more likely to be influenced by policy in the Local Plan.
IIA15: Health and Wellbeing	All the sites have good access to local healthcare facilities. In cases where this access is excellent, or new healthcare facilities are proposed, significant positive impacts have been identified.
IIA16: Historic Environment	Due to the sensitive nature of historic features, and their abundance in the borough, insensitively designed developments have the potential to alter the townscape negatively. On the other hand, the development may improve on existing structures at the site, giving positive impacts. The Holland Road Triangle site is located within an Archaeological Priority Area, which could mean that there could be disturbance to archaeological finds, hence the minor negative rating here.

IIA Objective	Significant Assessment Findings
IIA17: Energy	Energy efficiency strategies are more likely to be determined by policy than by site allocations. The designs of the Proposed Developments are also unknown at this stage hence the uncertain impacts identified. For Kensal Canalside, renewable energy generation has been included as part of the site allocation, hence the minor positive impacts at this site.

ASSESSMENT OF ALTERNATIVE SITES VS STRATEGIC SITES

4.1.6. A summary of the performance of alternative sites compared to the strategic sites has been provided below:

- The alternative sites have resulted in a greater number of uncertain effects, which generally due to the fewer specific site details. As further details emerge on these sites, there could be potential for more positive effects on a number of IIA objectives.
- Compared to the strategic sites, a number of sites are located in inappropriate locations which could compromise parks and open spaces and biodiversity. In particular the Land Between Ladbrooke Grove and Portobello Road, is located in a designated Site of Nature Conservation Interest.
- A number of sites are also located further away from community facilities and have lower access to public transport. At this time, there is limited information on whether public transport and community facility provision will be made. This has therefore resulted in more negative and uncertain effects on air quality, sustainable transport and community facilities, when compared to the strategic sites.
- The alternative sites have performed similarly to the strategic sites, with regards to flooding and climate change. Sloane Square House and 1 Holbein Place and The Plaza, 535 King's Road are both located within flood zone 3 and are currently not benefiting from flood defences. Without further details on scheme design, it is not clear the measure that will be put in place to protect these sites or how they will be made resilient to climate change.

4.1.7. Further details on the assessment of alternative sites can be found in **Section 6.4** of the main IIA Report and **Appendix B** to the main IIA Report.

4.2 EQIA ASSESSMENT

- 4.2.1. Overall, the policies will likely result in positive impacts on protected characteristic group members in the Borough. The policies aim to address a wide range of issues, identified by the key themes within the EqIA baseline (**Appendix D**).
- 4.2.2. The main protected characteristic groups that will particularly benefit include:
- **Age** – Particularly older people who have reduced mobility and require access to health and other services. Greater connectivity of developments with their surroundings could benefit those with reduced mobility by improving access. Policies will provide support for older people’s housing, including new extra care, sheltered housing and care homes to meet local needs.
 - **Disability** – Particularly people with a variety of disabilities will benefit from a more accessible environment. The NLPR includes policies which support inclusive design which will help to improve connectivity and function, benefiting users with mobility limitations.
 - **Deprivation** – Policies are likely to benefit people from low-incomes who require access to employment, education and housing and people with underlying health issues. Housing policies in particular have had positive effects as they will help to improve deprivation in the area by ensuring that housing needs are met, benefiting first time buyers, and those looking to move out of supported, familial or shared housing.
- 4.2.3. The assessment concludes that there will likely be a neutral impact for the following protected characteristic groups, assuming no unforeseen barriers emerge:
- Religion or Belief;
 - Sexual Orientation; and
 - Marriage and Civil Partnerships.

4.3 HIA ASSESSMENT

- 4.3.1. The HIA assessed the NLPR policies and considered their impact on the key determinants of health. These have been detailed below:
- **Air Quality:** Positive effects associated with Green-blue futures (refers to the use of blue elements like rivers and wetlands, and green elements such as trees and parks) policies as air quality improvements will help to minimise the negative effects upon those in the most vulnerable social groups. Conversely, urban intensification and additional housing in RBKC could result in a higher number of cars on the city’s roads, which could contribute to a worsening of air quality.
 - **Noise:** Mixed effects have been identified. The increase in housing in RBKC could result in higher numbers of cars, contributing to increased road traffic noise in the area. Additionally, construction related noise from developments may negatively impact upon the tranquillity of the Borough. However, the NLPR will aid in reducing noise and vibration as a result of construction and developments throughout the Borough, reducing the levels of nuisance felt to those living in close proximity to developments.

- **Housing and Homelessness:** Positive effects have been identified as housing policies will ensure that housing will be delivered in RBKC where housing is most in need and help more people secure housing. This could have positive effects for working aged adults (18-74) and those who are homeless.
- **Economy and employment:** Positive effects have been identified. Policies will encourage business investment in RBKC and improve the economy of the Borough. Additional town centre developments and an increase in shops is also likely to reduce unemployment in the Borough, having positive effects on the unemployed and low income residents in the Borough.
- **Skills and education:** Positive health effects have been identified. Business policies may improve employment opportunities for unemployment and young people, this will also improve on the job training and skills for young people in employment.
- **Social cohesion and community safety:** Positive health effects have been identified. Improvements to community housing and living conditions within RBKC, as proposed within this policy, are likely to improve social cohesion and community safety through improving the living standards and safety of community housing and residential areas
- **Access to services:** Positive health effects have been identified. New community housing developments within the Borough will have suitable access to community facilities and shops. Access to services will improve the health of elderly residents, improving health and reducing loneliness. Social infrastructure policies include the preservation and enhancement of recreation facilities, parks, and other facilities used as social hubs. The development of such areas may improve social cohesion and encourage those who are socially isolated to utilise facilities.
- **Physical activity:** Positive health effects have been identified. The inclusion of town centres within the 15-minute neighbourhood principle (idea that everyone living within the Borough can access a range of facilities that meet their day to day needs within a walkable distance) may improve physical activity rates. The policies proposed within social infrastructure focus on improving and preserving access to services (including sports and recreation) to all communities, encouraging physical activity and healthy lifestyles.
- **Green Infrastructure:** Mixed effects have been identified. Positive effects have been identified as Policy T3, specifically, outlines the requirements to create green infrastructure on the streets of RBKC. This will enhance the public health and promote social well-being through increasing the number of green spaces within RBKC. However, current proposed policies do not outline plans for additional green infrastructure to be developed alongside any housing development.
- **Climate change resilience:** Mixed effects have been identified. The policies proposed within Green-Blue Futures will attempt to limit the flood risk impacts of developments, therefore improving the resilience of all new developments within the Borough. However, this only accounts for new developments, leaving those in existing areas vulnerable to climate change events.

5 CUMULATIVE EFFECTS

5.1.1. A cumulative effects assessment was undertaken for the IIA. This looked at two different types of cumulative effects – Intra-project and Inter-project. These are defined as follows:

- Consideration of how different proposed policies and sites within the RBKC may interact and cause cumulative effects on a receptor (Intra-project effects); and
- How the proposed policies and sites within the RBKC could cause cumulative effects in association with other plans, policies and projects in the surrounding area (Inter-project effects).

5.1.2. **Table 5-1** below summarises the cumulative effects identified for both intra and inter – project effects. Further details can be found in **Section 7** of the main IIA Interim Report.

Table 5-1 – Cumulative Effects

Type of Cumulative Effects	Summary of Effects
Positive Intra-project Effects	<ul style="list-style-type: none"> • Potential positive effects on biodiversity (IIA1) if developments and policies support natural capital and biodiversity enhancements or provisions for open and green space • Increased public realm improvements across multiple developments with further support from NLPR policies is likely to result in positive effects on social inclusion and equality (IIA3) and reducing crime (IIA2). • Policies and development sites support the increase in office, retail and commercial space, which in combination are likely to result in positive cumulative effects on the local economy (IIA3). • Policies and developments are likely to result in an increase community facilities and services, result in positive effects on social inclusion and equality (IIA3) community facilities (IIA12) and health and wellbeing (IIA15). • Green-Blue Future policies encourage the incorporation of permeable surfaces, infrastructure and sustainable urban drainage systems (SUDs) which will help to reduce overall flood risk within the Borough. • If multiple developments are located with good connectivity to public transport facilities it will enable more people to use public transport modes instead of the use of a private car, helping to cumulatively improve air quality (IIA7) and increase use in sustainable transport modes (IIA10). • The provision of public realm improvements as part of some of the multiple housing developments, in particular the Kensal Canalside and Earls Court opportunity areas, will help to provide a net gain in in green spaces within RBKC, resulting in positive cumulative effects (IIA8). • There is potential for significant positive effects if multiple housing developments within RBKC were to come forward. These developments will help to meet RBKC's housing target (IIA13).
Negative Intra-project Effects	<ul style="list-style-type: none"> • Potential cumulative loss of land from larger developments (such as Earls Court and Kensal Canalside) is likely to have negative effects on biodiversity (IIA1). • Increased hardstanding surfaces as a result of developments could result in a cumulative increase in surface water flooding (IIA6).

Type of Cumulative Effects	Summary of Effects
	<ul style="list-style-type: none"> • Temporary negative cumulative effects during the construction phase. Construction of multiple developments may increase levels of greenhouse gas emissions through the embodied carbon associated with the construction and maintenance of the development (IIA5). • Temporary negative cumulative effects have the potential to result during the construction phase, if multiple housing developments were to come forward at the same time. Construction of these developments may reduce the air quality through an increase in particulate matter and dust (IIA7). • There is a potential for negative cumulative effects to result if multiple housing developments were to come forward due to the increased strain on existing community health facilities and the potential increased demand from new populations (IIA15). • There is the potential for negative cumulative effects on the historic environment if multiple housing developments were to come forward in close proximity to heritage assets and Conservation Areas (IIA16).
Positive Inter-project Effects	<ul style="list-style-type: none"> • Positive cumulative effects will result through the development of sustainable transport schemes (HS2, Crossrail 2, and Elizabeth Line). In combination with NLPR sites and policies, this will increase access to public transport modes, reducing the use of a private car, and therefore reducing greenhouse gas emissions and improving air quality. • Significant positive effects will result if multiple housing developments such as White City, Old Oak and Park Royal, and Paddington opportunity areas, were to come forward in combination with RBKC’s proposed development sites. • The provision and improvements to the public realm and open spaces, as part of some of these housing developments, will result in positive effects on the health and wellbeing of the population in the region (IIA15). • Greater cumulative connectivity will result through investments in sustainable transport developments such as HS2, Crossrail and the new Elizabeth underground line. This will help communities to gain greater access to jobs, services and facilities.
Negative Inter-project Effects	<ul style="list-style-type: none"> • There is the potential for cumulative loss, damage or fragmentation of habitats (IIA1) and loss of open spaces (IIA8) if multiple developments were to come forward such as the White City, Old Oak and Park Royal, and Paddington opportunity areas, as well as the new transport schemes (HS2, Elizabeth Line, Crossrail 2). • There is potential for negative cumulative effects on waste as a number of large scale projects such as HS2, Crossrail 2 and the Elizabeth Line coupled with development in the Borough, could lead to a large cumulative use of resources during construction. • Temporary negative cumulative effects have the potential to result during the construction phase, if multiple housing developments were to come forward at the same time. Construction of these developments may reduce the air quality through an increase in particulate matter and dust (IIA7). • There is a potential for negative cumulative effects to result if multiple housing developments were to come forward due to the increased strain on existing community health facilities and the potential increased demand from new populations (IIA15). • There is the potential for negative cumulative effects on the historic environment if multiple housing developments were to come forward in close proximity to heritage assets and Conservation Areas (IIA16).

6 MITIGATION AND MONITORING

6.1 MITIGATION AND ENHANCEMENT MEASURES

Where the assessment of policies and sites resulted in negative or uncertain effects on the environment, mitigation measures have been identified to compensate for this. A summary of the broad measures which will be taken to help mitigate the negative or uncertain (or enhance the positive) effects of the policies and site allocations (Strategic sites and Alternative sites) can be found in **Table 6-1** below.

Table 6-1 - Mitigation and Enhancement Measures

IIA Objective	Mitigation Measures
IIA1 -Biodiversity IIA15 – Health	The incorporation of natural features such as tree planting, hedgerows and floral arrangements, green walls, roofs and incorporation of vegetation to enhance connections to nature.
IIA2 – Crime	Development should incorporate designing out crime principles (in line with RBKC’s Designing Out Crime Supplementary Planning Document [SPD]), particularly for those potential development sites located in areas with high levels of crime deprivation.
IIA4 – Inclusion and equality IIA12 – Social and community facilities IIA15 – Health and wellbeing	Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting the new community.
IIA15 – Health and wellbeing	Scheme level health impact assessments should be undertaken (as per the London Plan) which will outline key ways to incorporate health into the development, ensuring the health and wellbeing needs of the population are met.
IIA16 – Heritage and townscapes	<p>New developments must seek to maximise sustainability benefits from existing landscape, townscape and heritage assets by valuing them inherently and for the wider services they provide.</p> <p>Promoters and designers should liaise closely with RBKC and Historic England to avoid or minimise negative impacts, such as land take and light pollution, whilst seeking to maximise benefits, such as tranquillity.</p> <p>Where developments are being built and/or improved within, or 500m outside of a designated historic asset, visual impacts assessment should be undertaken to determine magnitude of impact and possible mitigation.</p>
IIA11- Waste IIA14 – Recycling and re-use IIA17 – Energy	<p>Any form of construction and operation should be undertaken as sustainably as possible, making use of tools and processes, such as circular economy, waste hierarchy, CEEQUAL and BREEAM.</p> <p>Sustainable design and construction techniques should be promoted, such as low energy lighting and opportunities for renewable energy regeneration.</p>

IIA Objective	Mitigation Measures
IIA5 – Climate change IIA7 – Air Quality IIA10 – Sustainable transport	Opportunities must be taken within the planning process to limit car parking and make cycling, walking and public transport the modes of choice.
IIA2 - Crime IIA4 – Inclusion and equality IIA12 – Social and community facilities IIA15 – Health and wellbeing	Community safety, health and equalities should be considered in design, for example, pedestrian networks, including linking new developments into existing infrastructure, lighting and other safety design considerations, materials used (contrasting colours, non-slip surfaces), accessibility for all including those with reduced mobility or disability, well-being, affordability of schemes, active travel.
IIA5 – Climate change	All developments must be protected from effects of flooding, pollution and events exacerbated by climate change. Emissions of greenhouse gases must also be neutral wherever possible to address climate change.
IIA4 – Inclusion and equality	Inclusive mobility guidance should be adhered to ensure designs are accessible for everyone – specifically in reference to Conservation and Design policies.
IIA4 – Inclusion and equality IIA8 – Parks and Open Spaces IIA12 – Social and community facilities	New parks and open spaces should be accessible to all members of the public. Design should consider safety by including appropriate lighting, accessible pathways and access and egress points.
IIA3 - Economy IIA4 – Inclusion and equality	Employment should be focused on local residents in the first instance. The policy should aim to increase employment for protected groups where barriers to employment and education exist (low-incomes, younger people, disabled).
IIA4 – Inclusion and equality IIA10 – Sustainable transport IIA12 – Social and community facilities	Active travel infrastructure should be accessible and inclusive. Cycleways should provide enough space for adapted cycles such as tricycles, tandems and wheelchair cycles.

6.2 MONITORING

The aim of monitoring is to check whether the plan is having the significant effects that were predicted in the IIA, and to deal with any unforeseen problems. Monitoring is also used to manage uncertainty, improve knowledge, enhance transparency and accountability, and to manage sustainability information.

The Council's existing Authority Monitoring Reports already include a robust range of environmental and socio-economic indicators and are prepared in line with SEA Regulations, which could be used to help monitor the significant effects of the NLPR.

Table 6-2 below includes some potential monitoring measures that could be used by RBKC to monitor potential significant effects. As this is the Interim reporting stage, these measures are subject to change as the preferred policies and sites are refined and updated.

Table 6-2 – Potential Monitoring Measures

Potential Effects	What could be monitored?
Potential negative effects on the historic environment from proposed developments	<p>The number of historic assets (statutory and non-statutory) negatively affected by NLPR policies and sites</p> <p>The number of historic assets (statutory and non-statutory) benefiting from conservation and enhancement measure as a result of NLPR policies and sites</p>
Poor access to sustainable transport modes at a number of proposed developments	The number of new developments located in suitable areas where the transport requirements can be met in a sustainable manner
Uncertain effects regarding energy reductions on new developments	<p>The number of new developments which meet carbon emission reduction targets</p> <p>The number of new developments incorporating renewable energy initiatives</p>
Development of sites within flood zones and critical drainage areas	<p>Number of developments located within flood zones and critical drainage areas</p> <p>Number of developments benefiting from SuDs</p>
Uncertain effects waste reductions on new developments	<p>The number of new developments which incorporate waste saving initiatives</p> <p>Household and commercial waste and recycling figures for the Borough</p>

7 NEXT STEPS

- 7.1.1. This IIA Interim Report will be issued to consultees for a 6-week consultation period alongside the draft Local Plan.
- 7.1.2. RBKC is seeking the views of statutory bodies, the public and other stakeholders on the results of the IIA. Consultation at this stage continues to ensure that the IIA provides a robust assessment of the Local Plan.
- 7.1.3. An indicative timetable of the remaining stages of the IIA and Local Plan have been included in **Table 7-1** below.

Table 7-1 - Indicative Local Plan and IIA Timetable

IIA/ Local Plan Stages	Timescales
Consultation of Interim IIA Report and Draft Local Plan	February – March 2022
IIA Reporting and NLPR updates	Summer 2022
Final IIA report for Consultation	Summer 2022
Consultation of final IIA Report and preferred Local Plan	September - Autumn 2022
Final submission of IIA Report and Post Adoption Statement	Spring 2023



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