Integrated Impact Assessment Scoping for
Local Plan Partial Review

December 2015
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1. Introduction

1.1 The Council is undertaking a partial review of its Local Plan to review chapters and topics which have not been reviewed as part of the recent Core Strategy Reviews since the Core Strategy (now called the Local Plan) was adopted in 2010.

2. What is an Integrated Impact Assessment

2.1 The Integrated Impact Assessment (IIA) fulfils the requirements for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) (in a manner that incorporates the requirements of the European Union’s SEA Directive (2001/42/EU) and the transposing UK Regulations). The approach also fulfils the requirements for Health Impact Assessment and Equalities Impact Assessment. This integrated 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 both the assessment itself, as many of the issues covered in the different forms of assessment overlap, as well as simplifying outcomes and recommendations for policy makers. Where more detail on certain issues is required or necessary, this can be undertaken and included within the IIA.

2.2 Such an approach has been successfully followed by the Mayor of London for the London Plan which is also part of the Council’s development plan.

2.3 The process of undertaking a Sustainability Appraisal is well established and defined in national guidance. It is considered sufficiently detailed and appropriate to use this as the basis of the framework to integrate the assessment of potential impacts on health and equalities.

Sustainability Appraisal

2.4 In the summer of 2001, the European Union legislated for Strategic Environmental Assessment (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 was incorporated into UK law with the Environmental Assessment of Plans and Programmes Regulations 2004 and applies to a range of UK plans and programmes.¹

¹ See also para.001, NPPG SEA & SA
2.5 The Planning and Compulsory Purchase Act 2004 requires local planning authorities to carry out a sustainability appraisal (SA) of each of the proposals in a Local Plan during its preparation. More generally, the Act requires authorities to prepare plans “with the objective of contributing to the achievement of sustainable development”.

2.6 The Town and Country Planning (Local Planning) (England) Regulations 2012 include SA reports as one of the “proposed submission”, and “adoption” documents for Local Plans.

2.7 The National Planning Policy Framework 2012 (NPPF paragraph 165 – Environment) and the National Planning Policy Guidance (NPPG) on SEA and SA are clear that sustainability appraisal is integral to the preparation and the development of a Local Plan. Paragraph 006 of the NPPG encourages “work [on the sustainability appraisal process] to start at the same time that work starts on developing the plan.” Paragraph 013 of the NPPG includes a flowchart which shows the relationship between the sustainability appraisal and Local Plan preparation processes which is replicated in Figure 1 below.

2.8 Sustainability appraisals incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the ‘Strategic Environmental Assessment Regulations’), which implement the requirements of the European Directive 2001/42/EC (the ‘Strategic Environmental Assessment Directive’) on the assessment of the effects of certain plans and programmes on the environment. Sustainability appraisal ensures that potential environmental effects are given full consideration alongside social and economic issues.

2.9 By testing each plan policy against sustainability objectives, the IIA will assess and report the likely significant effects of the plan and the opportunities for improving social, environmental and economic conditions by implementing the plan.

**Equalities Impact Assessment**

2.10 An Equalities Impact Assessment (EqIA) is a way of measuring the potential impact (positive, negative or neutral) that a policy, function or service may have on different groups protected by equalities legislation, notably the Equalities Act 2010. This Act places a general duty on the Council as a public body to pay due regard to advancing equality, fostering good relations and eliminating discrimination for people sharing certain protected characteristics.

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2 S19(5); see also para.001, NPPG SEA & SA
3 S39(2); see also para.001, NPPG SEA & SA
4 R17; R22(1)(a); R26(a)(iii)
6 http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32001L0042:EN:NOT
EqIA is therefore an essential tool for demonstrating the Council has complied with the law by shaping the way decisions are taken and thereby improving outcomes. It enables a good understanding of needs and differential impacts that the policies may have on different groups.

Health Impact Assessment

2.11 Health Impact Assessment (HIA) is not a statutory requirement of the Local Plan preparation process. However, the NPPG\(^7\) states that "Local planning authorities should ensure that health and wellbeing, and health infrastructure are considered in local and neighbourhood plans and in planning decision making." It also states that "a health impact assessment may be a useful tool to use where there are expected to be significant impacts." Further London Plan Policy 3.2C says "The impacts of major development proposals on the health and wellbeing of communities should be considered, for example through the use of Health Impact Assessments (HIA)." Whilst some of this guidance related to ‘major development’ rather than plan-making it is considered that the emerging Local Plan Partial Review will include allocating sites for development and therefore it would be good practice that health impacts are considered in the plan-making process. This is particularly important as the Health and Social Care Act 2012 transferred statutory responsibility for public health to local authorities. In the Core Strategy SA, health impacts were considered through the SA framework and the EqIA. This will be reflected in the IIA; the health objective (objective 15) in the IIA framework will provide the context for HIA of policies and proposals.

Habitats Regulations Assessment

2.12 European Council Directive 92/43/EEC on the Conservation of natural habitats and of wild flora and fauna (the ‘Habitats Directive’) requires that any plan or programme likely to have a significant impact upon a Natura 2000 site (Special Area of Conservation (SAC) and Special Protection Area (SPA), which is not directly concerned with the management of the site for nature conservation, must be subject to an Appropriate Assessment. The overarching process is referred to as Habitats Regulations Assessment (HRA).

2.13 A HRA screening exercise will be undertaken to determine if the emerging planning policies (either in isolation and/or in combination with other plans or projects) would generate an adverse impact upon the integrity of a Natura 2000 site, in terms of its conservation objectives and qualifying interests. This

process will be documented in a Screening Report that will be submitted to Natural England for approval.

2.14 This is a parallel process to the IIA process and will be reported separately. However, its findings will be relevant to the IIA and vice versa so the two processes will need to interact. The NPPG states that ‘the sustainability appraisal should take account of the findings of a Habitats Regulations Assessment, if one is undertaken.’

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Figure 1: Sustainability Appraisal Process (National Planning Practice Guidance) *(Source: NPPG)*

**Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope**
1. Identify other relevant policies, plans and programmes, and sustainability objectives
2. Collect baseline information
3. Identify sustainability issues and problems
4. Develop the sustainability appraisal framework
5. Consult the consultation bodies on the scope of the sustainability appraisal report

**Stage B: Developing and refining alternatives and assessing effects**
1. Test the Local Plan objectives against the sustainability appraisal framework
2. Develop the Local Plan options including reasonable alternatives
3. Evaluate the likely effects of the Local Plan and alternatives
4. Consider ways of mitigating adverse effects and maximising beneficial effects
5. Propose measures to monitor the significant effects of implementing the Local Plan

**Stage C: Prepare the sustainability appraisal report**

**Stage D: Seek representations on the sustainability appraisal report from consultation bodies and the public**

**Stage E: Post adoption reporting and monitoring**
1. Prepare and publish post-adoption statement
2. Monitor significant effects of implementing the Local Plan
3. Respond to adverse effects

**Local Plan preparation**

- **Evidence gathering and engagement**

- **Consult on Local Plan in preparation (regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012).** Consultation may be undertaken more than once if the Local Planning Authority considers necessary.

- **Stage C: Prepare the publication version of the Local Plan**

- **Seek representations on the publication Local Plan (regulation 19) from consultation bodies and the public**

- **Submit draft Local Plan and supporting documents for independent examination**

- **Outcome of examination**
  Consider implications for SA/SEA compliance

- **Local Plan Adopted**

- **Monitoring**
  Monitor and report on the implementation of the Local Plan
3. Purpose of this report

3.1 The Scoping Report is Stage A in the process of preparing a Sustainability Appraisal as shown in Figure 1 above. The NPPG states that Stage A “must identify the scope and level of detail of the information to be included in the sustainability appraisal report. It should set out the context, objectives and approach of the assessment; and identify relevant environmental, economic and social issues and objectives.”

3.2 The purpose of this report is to set out the scope and level of detail of the information that will be included in the Integrated Impact Assessment. The report will present information on the proposed scope including:

- A1: PPSSIs: Identify the plans, policies, programmes, strategies and issues relevant to the policies being reviewed
- A2 Baseline: Set out the key baseline information
- A3 Key Sustainability issues
- A4 IIA Framework: The proposed IIA objectives and the assessment framework
- A5 Consult on the Scoping Report

3.3 Although the scoping stage is a requirement of the process, a formal scoping report is not required by law but is a useful way of presenting information at the scoping stage. A key aim of the scoping procedure is to help ensure the sustainability appraisal process is proportionate and relevant to the Local Plan being assessed.

4. Overview of the Partial Review

4.1 The Local Plan Partial Review Issues and Options consultation includes the following topic areas -

- Vision and Strategic Objectives
- Places
- Site Allocations
- Infrastructure and planning contributions
- Shops and centres
- Business uses and hotels
- Arts and cultural uses
- Rail infrastructure
- Housing
5. Background to the SA Objectives

5.1 A full SA of the Core Strategy 2010 was undertaken during its preparation. This included the production of the following documents:

- An initial Scoping Report (2005). This considered the appropriate content for the appraisals that had to be carried out; the Borough’s environmental baseline and the Council’s Sustainability Appraisal objectives against which the draft and the final policies were assessed. This was used as the basis of carrying out the sustainability appraisal of the various options outlined within the initial Issues and Options document.

- An Interim SA report (2007). This was published alongside the Preferred Options report and detailed the results of the SA of the Issues and Options.

- A Sustainability Appraisal Update report (2009). Given the length of time between the publishing of the initial scoping report and the draft policies, an additional report was produced. This provided a summary of all the stages of the SA process, including information on how the SA Reports influenced the Core Strategy; an update review of other policies, plans, programmes and sustainability objectives; the evidence base; new key sustainability issues and changes proposed to the original SA framework.

- The Final Sustainability Appraisal report for the Core Strategy (2009)

5.2 All of these documents are available to view on the Council’s website. The process included a very detailed Scoping and identification of SA objectives.

5.3 This Report extends the LDF SEA/SA Scoping Report (2005) and the Interim SA report (2009) to consider the policies being reviewed as part of the Local Plan Partial Review.

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5.4 It is recognised that there have been significant changes in the planning system since the adoption of the Core Strategy and the accompanying work on SA. However, the Council has been constantly reviewing the policies within the Core Strategy and undertook a Partial Review of its policies on Pubs and Local Character, Conservation and Design, other Miscellaneous Matters and Basements which were adopted in late 2013, 2014 and January 2015 respectively. Now the Council is undertaking another Partial Review to include a number of topic areas.

5.5 The Council clearly needs to update the relevant plans, policies, programmes, strategies and issues. It also needs to provide an up to date baseline of relevant topics being reviewed.


6.1 A plan or programme may be influenced in various ways by other plans or programmes, or by external environmental protection objectives such as those laid down in policies or legislation. These relationships enable the Responsible Authority to take advantage of potential synergies and to deal with any inconsistencies and constraints.

6.2 Some issues may already have been dealt with in other plans and programmes, and need not be addressed further in the plan or programme which is being developed. Where significant tensions or inconsistencies arise, however, it may be helpful to consider principles of precedence between levels or types of plan or programme; the relative timing of the plans or programmes concerned; the degree to which the plans, programmes and objectives accord with current policy or legal requirements; and the extent of any environmental assessments which have already been conducted.

6.3 An initial review of policies, plans, programmes, strategies and initiatives (PPPSIs) that may have an impact of the preparation of relevant policies being reviewed was undertaken. This review has informed both the development of the Local Plan Partial Review and the Integrated Impact Assessment. Many of these documents are referred to in Task A2: Collecting Baseline Information.
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<td>David Lock Associates et al for Mayor of London</td>
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<td>Shops and Centres Background Paper</td>
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**Q 1:** Are there any other Policies, Plans, Programmes, Strategies and Initiatives (PPPSIs) which should be considered for review?
7. A2 Collecting Baseline Information

7.1 The second element of collating evidence involves a review of the sustainability baseline. The distinction between what is ‘context’ and what is ‘baseline’ is in some instances blurry, although the baseline review is distinguished by a focus on collecting relevant quantitative information where possible. Again, the aim of the baseline review is to help identify sustainability issues in the Royal Borough (see SA Task A3 below), and it can also suggest indicators and thresholds that can aid the quantitative assessment of effects (where this is possible). The baseline review is also important in terms of suggesting appropriate monitoring indicators.

7.2 The NPPG sets out that the term ‘baseline information’ refers to the existing environmental, economic and social characteristics of the area likely to be affected by the Local Plan, and their likely evolution without implementation of new policies.

7.3 The area likely to be affected may lie outside the local planning authority boundary and plan makers may need to obtain information from other local planning authorities.

7.4 Baseline information provides the basis against which to assess the likely effects of reasonable alternatives in the plan.

7.5 Wherever possible, data should be included on historic and likely future trends, including a ‘business as usual’ scenario (i.e. anticipated trends in the absence of new policies being introduced). This information will enable the potential effects of the implementation of the Local Plan to be assessed in the context of existing and potential environmental, economic and social trends.

7.6 Baseline information provides the basis for predicting and monitoring environmental effects and helps to identify environmental problems and alternative ways of dealing with them. Both qualitative and quantitative information can be used for this purpose. Aspects of the baseline to be considered are listed in Annex I of the Directive, but the Environmental Report can focus on those where significant effects are likely, provided it is made clear why other matters do not need to be addressed. The baseline and environmental effects can also include matters not listed in Annex I, such as geological conditions, mineral resources, flood risk, energy consumption, noise and light pollution.

7.7 The Council is at an early stage of preparing the reviewed policies. The following paragraphs set out the baseline information that has informed the issues that the Local Plan Partial Review is seeking to address.
Vision & strategic objectives

7.8 The Consolidated Local Plan 2015 presents a detailed spatial portrait of the Borough. The Council produces a Monitoring Report annually which includes the most up to date information available on broad themes including demography and in depth monitoring of the effectiveness of the various planning policies. The monitoring report has four main sections which set out:

- progress made by the Council in producing the local development documents in accordance with its Local Development Scheme (LDS) (see chapter 2).
- A spatial portrait of the Borough. This includes the demography, employment and income, health and other indicators that present a picture of the local population (chapter 3).
- An examination of the success of the policies within the Council’s Core Strategy / Local Plan based on its structure, i.e.:
  - Strategic Objectives and Setting the Scene (chapter 4)
  - Keeping Life Local (chapter 5)
  - Fostering Vitality (chapter 6)
  - Better Travel Choices (chapter 7)
  - An Engaging Public Realm (chapter 8)
  - Renewing the Legacy (chapter 9)
  - Diversity of Housing (chapter 10)
  - Respecting Environmental Limits (chapter 11)
  - Places (chapter 12)
  - Infrastructure Delivery and Planning Obligations (chapter 13)

7.9 The performance of the Development Management function of the Council is set out in the final chapter, Planning Service Performance.

7.10 The latest Monitoring Report has been referred to in identifying the sustainability issues facing the Royal Borough.

Baseline

Indices of Multiple Deprivation October 2015

7.11 Updated Indices of Multiple Deprivation (IMD) scores were released in October 2015. The IMD 2015 is the official measure of relative deprivation for small areas in England. The data captured is shown in Lower Super Output Area (LSOA) boundary format and contains mostly 2012-13 data as an

10 LSOAs are geographic areas typically used to help with the reporting of small area statistics. An LSOA typically contains between 1,000 and 3,000 people (400-1,200 households). The IMD 2015 data uses 2011 LSOA boundaries compared to the 2010 IMD data which is presented in LSOA boundaries from 2001. The number and boundaries of LSOAs in RBKC has not changed since 2001, however the number of LSOA’s nationally has increased by 362 to 32,844.
update from the IMD 2010 scores which used predominantly 2008 data. The scores/ranks have been grouped into 10 per cent bandings or deciles.

**Headline IMD 2015 Results for Kensington and Chelsea**

7.12 RBKC has 11 (out of 103) LSOAs in the bottom 10 per cent decile in the latest 2015 data compared to nine in 2010. However, three of the bottom 10 per cent decile LSOAs from 2010 have now been ranked in a less deprived decile (20 per cent). See Map 1.

7.13 In RBKC, 56 LSOAs remained in the same decile and 47 have changed. Of those that have changed, 22 have decreased and 25 have increased.

7.14 RBKC overall was ranked 101st in 2007, 103rd in 2010 and is now ranked 104th (one being most deprived) according to its score. This means RBKC is less deprived relative to Hammersmith and Fulham (92nd) and Westminster (57th) (Figure 2).

7.15 The areas (domains) that cause the most deprivation in RBKC are: income, employment, crime, barriers to housing and the living environment. In terms of education, the Borough is in amongst the least deprived in London and around the London average for health.

7.16 However, it should be noted that some caution needs to be exercised when looking at changes between the IMD 2015 and previous rankings. Changes can only be described in relative terms and cannot tell us whether an area has become more or less deprived, only how deprivation has changed in relation to other areas. The IMD can tell you if one area is more deprived than another but not by how much. The IMD cannot be used to quantify wealth/affluence of an area.
Figure 2: Distribution of London Boroughs’ IMD 2015 rank (average rank of all LSOAs in each Borough weighted by population).
Map 1: Indices of Multiple Deprivation 2015

Note: White gaps are due to the change in LSOA boundaries. LSOAs remained unchanged in RBKC.
Ambitious for Tomorrow

7.17 The Council published a document called ‘Ambitious for Tomorrow 2014-2018’ in December 2014 to set out the Council’s vision to:

- Maintain our excellent services
- Protect our most vulnerable residents
- Rethink housing
- Create new opportunities
- Make our Borough yet more beautiful

7.18 In particular, the document notes, with regard to health and housing:

Kensington and Chelsea has a strong claim to be the best borough in the capital: best in terms of longevity, diversity, desirability and with the best built environment. But not all parts of it are the same. In North Kensington, many of our residents are missing out on years of good health. And much of our housing stock there requires refurbishment or replacement and is, in terms of architecture and urban design, markedly less attractive than the rest of the borough.

7.19 In terms of social and environmental, the document elaborates:

The relentless march of property prices is creating something of a ‘dumbbell community’, with lots of people at either end of the income spectrum but not so many in the middle. For those on ordinary or middle incomes who would like to live here to be closer to work or family, the stark truth is that they have little chance.

... 

In terms of social housing, we have far too many studios and one-bed flats but nowhere near enough family homes. That means we can have families stuck on the waiting list for years and is something that can only change through estate renewal.

Moreover, the borough’s housing stock only caters for those with either very high or very low incomes – there are even fewer opportunities for those on ordinary incomes to live in the borough. That, too, is something that can only be changed by making better use of Council land.

We want a borough in which people from every background can live. Estate renewal provides us with an opportunity to rebalance our community, and introduce more affordable homes and more intermediate homes for people on middle incomes.
7.20 In terms of traffic and transport, the document states:

A decision last April that there was no business case for a Crossrail station at Kensal Portobello was a setback for the Council’s ambitions but we are not giving up. The Council believes concerns about time lost by trains stopping at Kensal could be overcome by adding more track to the railway cutting so not all trains have to stop.

The Council estimates that just four to six Crossrail trains an hour stopping at Kensal Portobello would enable the best possible development of the adjacent gas works site, which would mean thousands of new homes and jobs and great new community facilities.

7.21 In terms of older people’s housing, the document states:

Expectations around how we look after older people are rising. Rather than a one-size-fits-all service in a traditional old people’s home, local authorities are these days trying to deliver ‘supported living’, tailored to individual needs and enabling people to stay in their own homes for as long as possible.

There is also a growing need for ‘extra care housing’ in which older people rent =, lease or buy their own homes in developments where care is available in the quantity and type required, and which can increase and change as older people become older and frailer.

7.22 In terms of creative industries:

The creative and cultural industries account for around 15 per cent of jobs (around 16,000 in total) in the borough and 30 per cent of businesses (around 4,000). This is three times the national average and high even by London standards.

7.23 On retail and commercial:

One of the joys of Kensington and Chelsea is its shopping streets. The evidence is that in terms of vacancy rates those streets that have stood up to the recession better than in most other places but even so, there are parts where they are not thriving or where they look increasingly homogeneous.

We have seen some very encouraging signs that Kensington and Chelsea’s profile as a location for creative businesses is growing. Those businesses bring employment, and they bring trade to our bars, cafes and shops. We want those businesses to be able to prosper and grow with us here in the Royal Borough, providing employment for local people, but currently there is a shortage of the right type of affordable and flexible business space in the borough.
And to protect the space we do have, we are now having to fight to preserve our hard-won exemption from new planning rules which allows changes of use from commercial to residential without planning permission.

7.24 On housing estates:

Some of our estates date from the 60s and 70s and exhibit all the faults of that far from golden era of public architecture. A few of them are coming to the end of their lives. Redevelopment could give our tenants better-quality homes, while all residents could benefit from the restoration of traditional street patterns, new shops and other infrastructure, as well as from a dramatically more attractive public realm.

It should be possible to transform the conditions in which many of our existing tenants live. The difference between a social home built as part of a 1960s estate and one built today in a street-front property integrated into the wider neighbourhood really is that dramatic.

And crucially, we will only redevelop an estate if it is possible to rehouse all existing tenants in better homes in the same area. Conserving and enhancing the local community is our primary objective in any regeneration project.

Gaps

7.25 There are no gaps in the data. The Council will take into account any further information if it becomes available during the course of policy preparation.

Emerging Issues

7.26 The issues set out in the ‘Ambitious for Tomorrow’ document above explain the key emerging issues. The Borough has some very deprived areas as well as some of the most affluent areas in the country. There is still a north south divide in the Borough in terms of the IMD 2015 scores (Map 1).

Likely future trends under the ‘business as usual scenario’

7.27 Under ‘business as usual’, spatial inequalities in health, fewer opportunities for those on ordinary incomes to live in the Borough and problems relating to the ageing population may persist.
Places

Baseline

7.28 The existing Local Plan identified fourteen places across the Borough but acknowledged that the Borough comprises many more places than these. The places identified mainly relate to the two spatial themes of the vision for the Borough; the regeneration of North Kensington, and enhancing the reputation of those places in the Borough with a national or international reputation – by and large the town centres. The following places were identified –

- Kensal
- Golborne/Trellick
- Portobello
- Westway
- Latimer
- Kensington High Street
- Earl’s Court
- Knightsbridge
- Brompton Cross
- South Kensington
- King’s Road/ Sloane Square
- Notting Hill Gate
- Fulham Road
- Lots Road/ World’s End

Gaps

7.29 There are no gaps in the information but any further information following consultation will be reviewed.

Emerging Issues

7.30 The ‘Places’ chapters of the Core Strategy (now known as the Local Plan) were introduced as part of this spatial approach to integrate development management with the actions of other bodies, both public and private that had a bearing on the future quality of the place. This was done through a clear vision about how they might evolve in the future and giving a clear framework for future actions expressed as Priorities for Action. However, five years on, it is arguable how successful this has been as an approach in terms of actual delivery. The Council believes that delivery could be strengthened by adopting a different approach.
Likely future trends under the ‘business as usual scenario’

7.31 These places are well established places within the Royal Borough and are likely to continue to be so. However, as outlined above the specific policies on each area may not have been as effective as desired. This is likely to continue if the Council does not take a different approach to this aspect of the Local Plan.
Site allocations

Baseline

7.33 There are eight strategic sites identified in the Local Plan where great change is envisaged. Seven of these sites were allocated in the Local Plan (as the Core Strategy in 2010). The eighth, Lots Road Power Station, had previously been granted planning permission.

7.34 Since the Local Plan was adopted some of the strategic sites have been fully or partly developed, while others have not progressed. The ones that do not benefit from a planning permission yet are listed below –

- Kensal Gasworks
- Land adjacent to Trellick Tower

7.35 Other strategic site allocations benefit from planning permission and are at various stages of development are as follows –

- **Wornington Green** – Development on-going with Phase 1 complete.
- **Kensington Leisure Centre** – Development completed and facilities opened in 2015.
- **Former Commonwealth Institute** – Development is nearing completion and the Design Museum is expected to open in late 2016.
- **Warwick Road** – The site allocation consisted to five sites. Of these, the former Charles House site, Telephone Exchange and Homebase site have all been implemented and are in various stages of completion. The Former Territorial Army site, allocated for 250 units, has planning consent for 281 units. The site at 100 West Cromwell Road allocated for 350 units currently has no extant permission. The future development of this site should include the community sports hall and funding towards streetscape improvements.
- **Earl’s Court** - Planning permission has been granted for a mixed use development in RBKC which includes up to 930 residential units including affordable housing, two CHP plants (one in RBKC/one in LBHF) and . The permission for RBKC also includes up to 10,132 sq m Class B1, 3414 sq m retail, 7,381 sqm hotel and 6,067 sqm of education, culture, community and leisure floorspace. The permission has been implemented and will take some 15 years to complete. The Royal Borough of Kensington and Chelsea and the London Borough of Hammersmith and Fulham, in partnership with the Mayor of London have produced a joint planning framework to guide future development in the Earl’s Court and West Kensington Opportunity Area.
7.36 The following potential new strategic site allocations have been identified and are subject to consultation as part of the Issues and Options consultation.

- Royal Brompton Hospital / Chelsea
- 37 Pembroke Road
- Barlby and Treverton Estates
- Silchester East and West
- 31-36 Harrington Road

**Gaps**

7.37 The Council will be consulting on the site allocations including a ‘call for sites’. Therefore more details/sites will emerge following the Issues and Options consultation.

**Emerging Issues**

7.38 The Council is required to allocate sites for development and this is necessary to demonstrate that the Council can meet its five year housing requirement, so not allocating strategic sites is not an option.

**Likely future trends under the ‘business as usual scenario’**

7.39 The Further Alterations to the London Plan has raised the Borough’s annual housing supply target from 600 dwellings per annum to 733 dwellings. In accordance with national and regional guidance, the Council must demonstrate that it is able to identify a supply of specific development and/or deliverable sites sufficient to meet the Borough’s housing target plus an additional buffer of 20% for the five years due to a record of persistent under delivery. Therefore the Council does need to consider allocating further sites and actively consulting on this important part of the Local Plan.
**Infrastructure and planning contributions**

**Baseline**

7.40 In terms of S106, the amount of S106 financial contributions agreed in each financial year for each 'category' of infrastructure is set out below:

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Amount of S106 financial contributions agreed in each financial year (April – March) for each category of infrastructure (excluding Earl’s Court)

**Gaps**

7.41 There is currently no published data on the amounts of Borough CIL received and spent by the Council since it became a CIL Charging Authority in April 2015. This is due to be reported by the end of 2016.
Emerging Issues

7.42 The Council needs to review its existing Local Plan policies relating to infrastructure and planning contributions because, since its adoption in 2010 (known as the Core Strategy at the time):

- The Council’s Community Infrastructure Levy (CIL) Charging Schedule and Regulation 123 (R123) List has taken effect (6 April 2015), limiting what the Council can negotiate in terms of Section 106 agreements (S106s); and
- The wider legislative, policy and guidance context relating to infrastructure and planning contributions has changed significantly.

7.43 The issues which the Council considers the Local Plan Partial Review needs to address in light of these changes are:

- S106 vs CIL infrastructure categories, standard charges and pooling
- Public art provision and contributions
- Open space provision and contributions
- Infrastructure planning to support the Local Plan Partial Review
- Thresholds for seeking S106s
- Viability and transparency

**Likely future trends under the ‘business as usual scenario’**

7.44 The Council needs to amend its planning policies and approach to seeking developer contributions to ensure it is maximising contributions to essential local infrastructure to support new development and communities. If a ‘business as usual scenario’ is followed, the Council may be missing out on contributions to, and the provision of, such essential local infrastructure.
Shops and centres

Baseline

7.45 The Borough contains a wide range of centres, ranging from the small parade of shops to international centres such as Knightsbridge. The London Plan sets out the hierarchy of town centres across the capital. The Royal Borough contains centres in each category save a “Metropolitan Centre.” The position of the Borough’s centres within the London Plan’s hierarchy is set out in Table 1 below.

7.46 The location of the larger centres is shown in Figure 3.

Table 1: The Borough’s centres and their position within the hierarchy

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<thead>
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<th>Type of centre</th>
<th>Designation</th>
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</thead>
<tbody>
<tr>
<td>International Centre</td>
<td>London’s globally renowned retail destinations with a wide range of high-order comparison and specialist shopping with excellent levels of public transport accessibly. Knightsbridge</td>
</tr>
<tr>
<td>Metropolitan Centre</td>
<td>Serve wide catchments which can extend over several boroughs and into parts of the wider South East region. Typically they contain at least 100,000 sqm of retail, leisure and service floor space with a significant proportion of high-order comparison goods relative to convenience goods. None</td>
</tr>
<tr>
<td>Major Centres</td>
<td>Typically found in inner and some parts of outer London with a borough-wide catchment. They generally contain over 50,000 sqm of retail, leisure and service floorspace with a relatively high proportion of comparison goods relative to convenience goods. They may also have significant employment, leisure, service and civic functions. King’s Road (East) Kensington High Street</td>
</tr>
</tbody>
</table>

## Type of centre

<table>
<thead>
<tr>
<th>District Centres</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Distributed more widely than Metropolitan and Major Centres, providing convenience goods and services for more local communities and accessible by public transport, walking and cycling. Typically they contain 10,000-50,000 sqm of retail, leisure and service floorspace. Some District Centres have developed specialist shopping functions. The “Special” District designation used by the Council is intended to highlight when a centre has an unusual function. It is intended to alter the London Plan designation.</td>
<td>South Kensington King’s Road (West) Notting Hill Gate Fulham Road (Fulham Road West in the London Plan) Brompton Cross (Fulham Road East in the London Plan) The following centres are designated as District Centres within the London Plan but as “Special District Centres” within the Local Plan: Portobello Road Westbourne Grove.</td>
</tr>
</tbody>
</table>

| Neighbourhood Centres | Barlby Road, Ladbroke Grove (North), Golborne Road (North), North Pole Road, St Helen’s Gardens, Ladbroke Grove Station, All Saints Road, Westbourne Park Road, Clarendon Cross, Holland Park Avenue, Holland Road, Napier Road, Kensington High Street (West), Thackeray Street, Pembroke Road, Earl’s Court Road, Earl’s Court Road North, Stratford Road, Gloucester Road, Cromwell Road Air Terminal, Gloucester Road (South), Old Brompton Road (West), Old Brompton Road (East), Ifield Road, The Billings, Fulham Road (Old Church Street), Walton Street, Lowndes Street, Pont Street, Sloane Avenue, Elystan Street, Chelsea Manor Street, Lower Sloane Street, World’s End, and Fulham Road/ Brompton Cemetery. |

Typically serve a localised catchment often most accessible by walking, cycling and include local parades and small clusters of shops mostly for convenience goods and other services. They may include a small supermarket, sub-post office, pharmacy, laundrette and other useful local services. Together with District Centres they can play a key role in addressing areas deficient in local retail and other services. (These smaller centres are not part of the London Plan’s hierarchy.)
7.47 These larger centres are supplemented by 37 smaller neighbourhood centres, centres which tend to serve the day to day needs of local residents and visitors.
The Borough is fortunate in that most of its centres remain successful and well used despite the rapidly changing character of the country’s retail sector. The larger centres continue to attract visitors from across the capital, and indeed, in the case of the King’s Road, Brompton Cross, Knightsbridge and Portobello Road, from across the world. The most telling manifestation of this buoyancy relates to the generally low vacancy rates, which in the Summer of 2015 were just 6.9%\textsuperscript{12} compared to a London-wide average of 9.8% and a national average for shopping centres closer to 15%.\textsuperscript{13}

Low vacancy rates are not just a characteristic of the larger centres, but also the smaller neighbourhood centres which are also generally holding their own. They also continue to enjoy low vacancy levels (5.9%), and continue to serve the day-to-day needs of local residents.

**Diversity**

Success can be measured by diversity as well as by vacancy, with the maintenance of a concentration of shops within the centres being an essential element of a successful centre. In 2015 60% of all ground floor units in all centres remained as shops, 14% restaurants and cafes and 8% financial and professional services.\textsuperscript{14}

Since 2010 the Council has been monitoring the balance of independent and chain shops. This figure has remained broadly stable at between 33% and 36%. In 2015 the figure was 35%.\textsuperscript{15} This ranges widely from 50% of units within Kensington High Street to just 15% in Portobello Road.

**Retail need**

Predictions of need for retail are notoriously difficult to pin down and as such have become an industry in themselves. However, the Council’s Retail and Leisure Needs Study\textsuperscript{16} commissioned in 2008 to inform the then Core Strategy (now Local Plan) suggested that some 25,500 sq m of comparison retail floorspace was needed to 2015.

Whilst the Council recognises that this Retail Needs Assessment was carried out in a very different economic climate to today, evidence recently published by Experian on behalf of the GLA suggests that the ‘bricks and mortar’ need for extra comparison shopping floorspace is actually increasing in the

\textsuperscript{12} RBKC Monitoring Report 2015..
\textsuperscript{13} Vacancy Report, H1 2015 Summary, Local Data Company (September 2015)
\textsuperscript{14} RBKC, Town Centre Surveys 2015.
\textsuperscript{15} ibid
\textsuperscript{16} RBKC, Retail and Leisure Needs Study, NLP, 2008.
This is unusual in a London context, and reflects the trend for a concentration of the retail offer in the larger and more successful centres. These are the centres that are particularly well-represented in the Borough. The Experian study suggested that the net floorspace requirement across Kensington and Chelsea (2011-2036) amounted to some 171,000 sq m of comparison shopping. Taking a crude yearly average, this would equate to a need for some 5,700 sq m of floorspace each year compared to the 5,400 sq m annual need suggested in the 2008 NLP report. The Council does recognise that uncertainty is inherent in forecasting for retail needs beyond five years or so. The comparison is however useful, as it does indicate the quantum of need which it may be reasonable to expect in the longer term.

7.54 The Council’s Retail Needs Assessment was carried out by Nathaniel Lichfield and Partners (NLP) to inform the Core Strategy. This indicated an additional need of about 31,000 sq m of comparison retail floorspace in the Borough from 2008 to 2015. Of this, 25,500 sq m is needed in the south and about 650 sq m is needed in the north and centre of the Borough.

Gaps

7.55 With the review of the policies relating to town centres and town centre uses, the Council has considered it timely to commission an update to the original NLP Retail Needs Study. This will consider current patterns of shoppers as well as increased in expenditure to offer a more local perspective on the Experian London-wide study. This study will be published as a piece of evidence to support the draft policies consultation (regulation 19) early in 2016.

Emerging Issues

Mis-match between retail supply and predicted need

7.56 The ongoing review of the Council’s retail policies in the Borough’s various monitoring reports have demonstrated that the mismatch between predicted need and the provision has been significant. The 2015 Monitoring Report shows that there has actually been a net loss of 3,355 sqm of retail floorspace since 2008. This mismatch is significant in that it would suggest that a lack of new retail space coming forward is hindering the existing town centres reaching their full potential. The Council needs to decide how to address this issue.

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18 RBKC, Retail and Leisure Needs Study, NLP, 2008.
Changes to the classification and the boundaries of the Borough’s town centres

7.57 The boundaries of the Borough’s town centres were last reviewed some 20 years ago to inform the Borough’s first Unitary Development Plan in 1995. Incremental changes and the changing functions of some of the Borough’s centres mean that that both the boundaries and the classification of some of the Borough’s centres need amending.

The changing nature of the retail economy

7.58 The retailing economy is never static. However, the ever increasing importance of e-commerce and troubled trading conditions has accelerated this change. Whilst not immune the Borough has weathered this storm better than most, with retailers choosing to remain in our centres. However, there is still much uncertainty and an increasing unlevel playing field as local retailers have to compete with the multinational. New policies should reflect the changing market conditions and the new nature of retailing.

Loss of planning controls

7.59 The Council is of the view that maintaining diversity of uses within a town centre is central to maintaining the health and the success of a centre. This is as much the case now, with centres under pressure from changing patterns of retailing, as it has been in the past. However, the Council’s ability to control this balance has been eroded by the recent change to the GPDO. There is a legislative and policy context of increased, and not less, flexibility. The Council must decide if/ how future policies reflect these changes.

Likely future trends under the ‘business as usual scenario’

7.60 Should the issues identified continue with the existing policy framework, it is anticipated that the following future trends will emerge:

- Given the draw of the majority of the Borough’s larger centres, modelling of future retail need would suggest that the Borough’s centre have a viable future. Unlike centres in some other parts of the capital, there is likely to be a need for additional retail floorspace. However, given the differential in value between residential and nearly any other use the provision of additional retail floorspace at the edge of existing centres may not be forthcoming. This may have implications on the ongoing growth of our centres.

- There is a high degree of uncertainty associated with the provision of new retail floorspace. However, the Council expects the provision of a significant amount of new retail floorspace within sites surrounding the
Borough, including for example the wider Earl’s Court site, Westfield and Battersea. These developments may draw trade away from the Borough’s centres.

- The relaxations to planning regulations may see the loss of significant numbers of A1 units in some of the Borough’s centres. These may be of particular significant in the Borough’s smaller centres, where a rise in A2 estate agents could have a detrimental impact on the very function of these centres.

Business uses

Baseline

7.61 The existing office (B1(a)) floorspace is estimated to be approximately 718,000 sq m\(^1\), some 4,000 firms, or 23% of the Borough’s stock. It employs an estimated 20,300 people, which represents 17% of all employment in the Borough\(^2\).

7.62 The office market in Kensington and Chelsea forms the western fringe of the West End Office market, part of the wider Central London market. Its profile varies across the Borough. It provides a mix of stock from small mews style office buildings to larger purpose built office developments or converted warehouses in the core commercial clusters.

7.63 The Borough has a full cross section of business types. However, in the same way as the City of London is known for its financial and insurance services, so Kensington is known for its music, fashion and creative businesses. Some of these are of national and international significance. The Borough is, for example, home to the four major record labels, some 400 associated independent studios and production facilities, providing an estimated 28% of all the country’s employment in the music publishing sector.\(^3\)

7.64 The light industrial and warehousing sector is much smaller in scale, estimated by the Valuation Office\(^4\) to be some 66,000 sq m. Much of this constitutes studios and hybrid workshop/office uses, rather than traditional factories, workshops or warehouses.\(^5\)

\(^1\) Office Market Review and Viability in RBKC, 2014, Frost Meadowcroft
\(^2\) Impact of proposed changes to permitted development rights for Kensington and Chelsea, TBR, 2013
\(^3\) ibid
\(^4\) Office Market Review and Viability in RBKC, Frost Meadowcroft, 2014. This is based on the most recently published figures from the VOA, from data collected in 2010
\(^5\) RBKC Commercial Property Study, Peter Brett Associates, 2013
7.65 The attractiveness of the Borough as an office location is reflected by both the healthy rental levels achieved across most of the area, and by the extremely low levels of office availability.

7.66 Office vacancy rates across the Borough remain low. Indeed, local agents Frost Meadowcroft have confirmed that, “office supply has tightened in the Royal Borough of Kensington and Chelsea despite the effects of the Chinese slowdown, as good demand from businesses has led to an office vacancy rate of just 1.72%.”\(^\text{24}\) For reference, the natural level of voids (a similar but not identical measure as vacancy) is considered by the GLA to be 8%. This is a figure which allows a natural level of churn and a figure that would suggest that demand and supply is broadly in balance.

7.67 Low vacancy rates is a useful indication as to the strength of the Borough’s office market. The Council has, however commissioned a further study to specifically consider the viability of office uses across the Borough. The Office Market Review undertaken by Frost Meadowcroft, was published in August 2014.\(^\text{25}\) It concentrates on the viability of bringing office premises up to modern standards. It looks at the various sub-markets with the Borough and the different types of property within these sub areas. It then makes an assessment as to the viability of the business uses using an “investment value appraisal”. This assessment concludes that in all the properties assessed, the “property benefitted from a net increase in asset value after allowance for associated costs”, were the business floorspace to be brought up to modern occupier standards.

7.68 The study also considered the viability of the investment required in cash terms to bring the property up to the necessary standards. The investment was taken to be viable where the uplift in value was likely to be greater than 10% of the capital employed. A summary of the conclusions are included in table 2 below.

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\(^{24}\) Frost Meadowcroft, Market Update Q3 2015.

\(^{25}\) Office Market Review and Viability in the Royal Borough of Kensington and Chelsea, Frost Meadowcroft, 2014
### Table 2: Summary of viability of B class uses in RBKC

<table>
<thead>
<tr>
<th></th>
<th>Mixed use</th>
<th>Purpose built (under 3,000)</th>
<th>Purpose built (over 3,000)</th>
<th>Converted buildings</th>
<th>Warehousing/light industrial</th>
<th>Serviced offices</th>
</tr>
</thead>
<tbody>
<tr>
<td>North Kensington</td>
<td>Viable</td>
<td>Viable</td>
<td>N/A</td>
<td>Viable</td>
<td>Viable</td>
<td>Viable</td>
</tr>
<tr>
<td>Notting Hill</td>
<td>Marginal</td>
<td>Marginal</td>
<td>Viable</td>
<td>Viable</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Kensington</td>
<td>Viable</td>
<td>Marginal</td>
<td>Marginal</td>
<td>Viable</td>
<td>N/A</td>
<td>Marginal</td>
</tr>
<tr>
<td>Earl's Court</td>
<td>Viable</td>
<td>N/A</td>
<td>Viable</td>
<td>Viable</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>South Kensington</td>
<td>Viable</td>
<td>Viable</td>
<td>Viable</td>
<td>Viable</td>
<td>N/A</td>
<td>Viable</td>
</tr>
<tr>
<td>Knightsbridge</td>
<td>Viable</td>
<td>Marginal</td>
<td>Viable</td>
<td>Viable</td>
<td>N/A</td>
<td>Viable</td>
</tr>
<tr>
<td>Chelsea</td>
<td>Viable</td>
<td>Viable</td>
<td>Viable</td>
<td>Viable</td>
<td>Marginal</td>
<td>N/A</td>
</tr>
<tr>
<td>Latimer EZ</td>
<td>N/A</td>
<td>Viable</td>
<td>Viable</td>
<td>Viable</td>
<td>Viable</td>
<td>N/A</td>
</tr>
<tr>
<td>Lots Road EZ</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>Viable</td>
<td>N/A</td>
<td>Viable</td>
</tr>
<tr>
<td>Kensal EZ</td>
<td>Viable</td>
<td>Viable</td>
<td>N/A</td>
<td>Viable</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

Source: Office market Review and Viability in the Royal Borough of Kensington and Chelsea, Frost Meadowcroft, 2014

7.69 The Council has also specifically considered the nature of the office market in the Latimer Road area to the North of the Westway. The Council’s consultants concluded that this remains a viable office location. This conclusion was supported by the independent inspector for the examination of the St Quintin and Woodlands Neighbourhood Plan.

7.70 So, in summary, the Borough’s office market is vibrant and there is no reason to believe that the any of the main office locations are intrinsically unviable for continued office use. There are, however, small pockets within the Borough where the market is less robust or where encouragement is needed if future refurbishment is to come forward.

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26 Latimer Road Commercial Properties Viability Study, Frost Meadowcroft, April 2015.
Gaps

7.71 A number of studies commissioned since the adoption of the Core Strategy in 2010 has ensured that the Council has an understanding of the nature of the Borough’s stock of business properties, vacancy rates, rental values and overall viability. However, whilst the Council has looked at the pipeline for forthcoming B class development and have made an estimate of other possible supply we do not have a complete picture. The Issues and Options consultation includes a call for sites to help address this gap. This will feed into a future Employment Land Availability Assessment.

Emerging Issues

Differential in value to put remaining office stock under more pressure.

7.72 For some time the Borough’s stock of business premises has been under considerable pressure from residential uses, a pressure driven by the differential in value between business and residential uses. The vibrancy of the office sector, with low vacancy rates and healthy returns would mean little when compared to the opportunities to increase value through conversion to residential. This pressure will only increase as spiralling residential values draw further away from any alternative land uses.

7.73 The threat to the Borough’s stock of business premises was quantified in 2013. Without any policy protection for business uses, the Council estimated that 1,200 firms would be at a high risk of loss. These firms employ some 7,000 people and have a Gross Value Added (GVA) of £560 million. A further 1,100 firms employing 3,300 people with a GVA of £350 million lie in properties considered to be at a medium to high risk of conversion.27

7.74 Given the differential in value across the Borough, the threat is not merely limited to a few central areas. The map showing properties at risk is reproduced in Figure 4 below.

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27 Impact of proposed changes to permitted development rights for Kensington and Chelsea for RBKC, TBR, 2013
Figure 4: Business properties at risk from conversion

Source: Impact of proposed changes to permitted development rights for Kensington and Chelsea, TBR, 2013
Likely future trends under the ‘business as usual scenario’

7.75 Should the issues identified continue with the existing policy framework, it is anticipated that the following future trends will emerge:

- Increasing pressure on remaining business uses as land owners seek to maximise the value of their holdings.
- Despite a general presumption against the loss of B class uses, there continues to be a loss of business floorspace. Much of this loss is to other “valued” uses, often to other non residential town centre uses. This is likely to continue.
- The Council is home to very little true B1(c) light industrial floorspace. Over time much has changed to flexible hybrid spaces or to conventional B1(a) office use under permitted development. This trend, and the loss of light industrial use, is likely to continue.

Hotels

Baseline

7.76 Tourism is one of the Borough’s key economic drivers. In 2008, it was estimated that some £3.1 billion was spent in the Borough by tourists. £750 million of this was related to stays in hotels.

7.77 The GLA’s hotel study of 2013 suggests that the Royal Borough potentially needs 2,700 additional rooms by 2036 to meet the increasing need. This is over and above the 19,300 rooms currently being provided in the Borough, third in London behind the Boroughs of Westminster and Camden.

Gaps

7.78 The Borough is fortunate in that the GLA take a special interest in both monitoring the existing supply of hotel accommodation by Borough, and in predicting the future need. As such there are no particular gaps in the information required to draft an effective and relevant policy.

Emerging Issues

- The differential in value between residential uses and hotels in much of the Borough means that the pressure on the Borough’s stock of hotels is likely to increase.

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Likely future trends under the ‘business as usual scenario’

7.79 As above.

Arts and cultural uses

Baseline

7.80 The Borough contains a host of arts and cultural uses. These range from the South Kensington Museums, of the world’s largest tourist attractions, to the small galleries. There is not, however, a comprehensive list of all such uses on one place.

Gaps

7.81 There is no single list which includes all of the Borough’s arts and cultural attractions.

Emerging Issues

7.82 In a time of greatly reduced government subsidy, there will pressure on the budgets of cultural and arts institutions. Some of this pressure will result in a need for greater flexibility of use, and this will not necessarily sit comfortably with residents living in the vicinity.

7.83 These pressures can also result in organisations seeking to rationalise their operations, and this can include loss within the Borough. Rationalisation can allow organisations to gain from the significant differential in value between arts and residential uses.

Likely future trends under the ‘business as usual scenario’

7.84 As above
Rail Infrastructure

Baseline

7.85 Public Transport Accessibility Levels (PTALs) used as a measure of determining parts of London best served by public transport are amongst the highest in the Royal Borough. However, in parts of the north and south west of the Borough the score is very low. Proposals for Crossrail can bring significant public transport benefits to these areas.

Kensal Crossrail

7.86 The Council continues to seek agreement from Crossrail Limited that a station should be sited in Kensal Portobello. Since 2010, the Council has developed a more sophisticated economic and operational argument demonstrating that a station is vital for unlocking regeneration and improving employment prospects in the wider area.

Crossrail 2

7.87 The proposals for Crossrail 2 (formerly known as the Chelsea Hackney Line) are significant in terms of being able to delivering a new rail station in the Borough.

7.88 Since 2010, the safeguarded route has changed to reflect the revised engineering for the route. This engineering has eliminated the provision of a station at Imperial Wharf as the curve in the tunnel from Clapham would be too acute and too costly to deliver. In spite of this, nearly 5,000 homes will be within a 10 minute walk of the rail network for the first time.

West Brompton

7.89 The provision of step free access and improved capacity at West Brompton is being delivered via the section 106 agreement linked to the planning permission for Earl's Court.

Gaps

7.90 The Council will be consulting on Policy CT2. Therefore, more details will emerge following the Issues and Options consultation.

Emerging Issues

7.91 None.
Likely future trends under the ‘business as usual scenario’

7.92 Without a Crossrail station, Kensal Canalside Strategic Site would come forward at a lower density as the PTAL scores would not allow for greater intensification.

7.93 Chelsea would continue to function much as it does. However, the projected population increases within the life of the Plan would suggest that the King’s Road would become even more heavily trafficked with limited capacity on the District and Circle Lines. Footfall would continue to suffer towards the west of King’s Road when compared to the area around the transport nodes at Sloane Square.
Housing

Baseline

Housing Stock

7.94 The most recent Government data indicates that there were 85,550 dwellings in the Royal Borough in 2014. This total has been growing, but at a relatively slow rate when compared to its inner London neighbours, with only a 1% increase the last six years. The make-up of the dwelling stock in terms of type shows that in comparison with neighbouring authorities the Borough has a low proportion of houses (17%) with the majority of the stock made up of purpose built and converted flats (79%). This is higher than both the Inner London and London-wide averages. The major feature of change in the housing stock in recent years is the growth in the proportion of purpose built flats.

7.95 The 2011 Census showed that the private rented sector has just overtaken owner-occupation as the largest single tenure in RBKC, with both tenures housing 36% of households. The social rented sector accounts for a further 25% and shared ownership less than 1%. In terms of dwelling size, the Borough has a greater proportion of smaller homes than the inner London and London average. Nearly three quarters (72%) of the current stock are one and two bedrooms compared to 66% for inner London and 54% for the whole of London. There is also a reasonable proportion of large homes (four bed plus) at 11% which is equivalent to the inner London average. The Census also highlights that there are differences in dwelling size by tenure. For example 40% of the owner occupied stock has three beds or more compared to only 20% in each of the social rented and private sector rented stock.

Vacancy and Second Homes

7.96 Across London as a whole, residential vacancy rates are generally low as a result of the significant demand for housing. Vacancy rates in Kensington and Chelsea as in neighbouring inner London Boroughs have fallen as a proportion of total stock over the last five years to under 2,500 units.

7.97 In relation to second homes, the 2014 Council Tax Base assesses the number and proportion of homes classified as ‘second homes’. The figures for the Royal Borough for 2014 showed 8,330 second homes, equivalent to 9.5% of the total housing stock. This compares to only 2.4% in Hammersmith and Fulham and 4.9% in Westminster. Kensington and Chelsea is almost the highest ranked borough in terms of both the number and proportion of second homes with only the City of London (at a proportion of 27%) and Cornwall (overall numbers) in higher positions.
Houses in Multiple Occupation (HMOs)

There are currently estimated to be 4,500 HMOs in the Royal Borough, amounting to nearly 16% of the private rented stock. Whilst this proportion is significant, it is a lower proportion than neighbouring Boroughs with Westminster at 19% and Hammersmith and Fulham at 39%.

House Prices

Kensington and Chelsea occupies a distinctive position within the overall London housing market. Median house prices in the Borough have increased at the highest rate in the country since the Local Plan was first adopted (as the Core Strategy) in 2010 (60%) leading to highest median house price in England of £1.2 million in 2014.

Housing Need

The Borough’s 2015 SHMA identifies an objectively assessed need (OAN) of 11,291 dwellings over the period 2015-2035, which is equivalent to 575 dwellings per annum. These figures are based on the GLA’s long-term migration household projections plus an allowance for vacant dwellings and second homes.

The annual need for affordable housing, which is based on an estimate of the total amount of affordable housing required to meet the need of households which cannot afford to access market housing, is high. The annual need figure assesses the ability to afford housing across newly forming households, not simply the net addition to household numbers as per the OAN. It is estimated at 1,171 affordable homes per year, which can be broken down by tenure as follows:

- Social rented sector: 209 units (18%)
- Affordable rented sector: 523 units (45%)
- Intermediate sector: 437 units (37%)

The size of dwellings required by newly emerging households has also been assessed in the Borough’s 2015 SHMA. For all types of housing the evidence of need is as shown in Table 3 below:

**Table 3: Dwelling Size Need**

<table>
<thead>
<tr>
<th>Dwelling Size</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Bed</td>
<td>23%</td>
</tr>
<tr>
<td>2 Bed</td>
<td>29%</td>
</tr>
<tr>
<td>3 Bed</td>
<td>30%</td>
</tr>
<tr>
<td>4+ Beds</td>
<td>18%</td>
</tr>
</tbody>
</table>
The SHMA also identifies the specific needs for those in need of affordable housing by tenure as shown in Table 4 below:

### Table 4: Affordable Housing Need by Size

<table>
<thead>
<tr>
<th>Sector</th>
<th>Bed size</th>
<th>Number</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Social rented sector</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 bed</td>
<td>443</td>
<td></td>
<td>32%</td>
</tr>
<tr>
<td>2 bed</td>
<td>355</td>
<td></td>
<td>26%</td>
</tr>
<tr>
<td>3 bed</td>
<td>256</td>
<td></td>
<td>19%</td>
</tr>
<tr>
<td>4+ bed</td>
<td>316</td>
<td></td>
<td>23%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>1,369</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Affordable rented sector</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 bed</td>
<td>347</td>
<td></td>
<td>16%</td>
</tr>
<tr>
<td>2 bed</td>
<td>559</td>
<td></td>
<td>26%</td>
</tr>
<tr>
<td>3 bed</td>
<td>532</td>
<td></td>
<td>25%</td>
</tr>
<tr>
<td>4+ bed</td>
<td>676</td>
<td></td>
<td>32%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>2,113</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Intermediate sector</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 bed</td>
<td>242</td>
<td></td>
<td>16%</td>
</tr>
<tr>
<td>2 bed</td>
<td>392</td>
<td></td>
<td>26%</td>
</tr>
<tr>
<td>3 bed</td>
<td>373</td>
<td></td>
<td>25%</td>
</tr>
<tr>
<td>4+ bed</td>
<td>474</td>
<td></td>
<td>32%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>1,482</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>4,965</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

In Kensington and Chelsea, adults aged over 65 is the fastest growing household group with the share of those aged 65 and over increasing from 14% in 2012 to 23% in 2037, a rise from 10,900 to 20,000 in absolute terms. Whilst an ageing population is a national issue, it is notable that the projected proportion in Kensington and Chelsea is notably higher than the London projected average of 14%. This growth has implications in terms a reduction in the economically active population, as well as increasing health, care and housing support needs. In terms of households, the SHMA shows a projected increase of 55% from 16,750 over 65 households in 2014 to 25,938 in 2035.
However, the most important trend in terms of needs is the anticipated accelerated increase in over 85 households who are most likely to need specialist accommodation.

7.105 It is recognised that the majority of older people will prefer to remain in their own home and support for this is provided in relation to new housing through requirements to meet the revised Part M Building Regulations for accessible and adaptable dwellings. However, evidence in the London and Borough SHMA also suggest that a proportion of older Londoners are interested in a move to specialist housing where this is made available. Annex 5 of the London Plan also provides indicative benchmarks on the amount of specialist accommodation needed each year for older people over the next 10 years. The benchmark for the Royal Borough is set at 100 units of specialist older people provision per annum, with the majority (60%) provided for private sale. The need forecasts for specialist older people’s housing set out in the Borough’s SHMA are slightly lower than the London Plan benchmarks at 87 units per annum over the next ten years.

**Housing Supply**

7.106 The Further Alterations to the London Plan has raised the Borough’s annual housing supply target from 600 dwellings per annum to 733 dwellings. This target is above the objectively assessed need for housing identified by the Borough’s SHMA of 575 new homes each year. In accordance with national and regional guidance, the Council must demonstrate that it is able to identify a supply of specific development and/or deliverable site sufficient to meet the Borough’s housing target plus an additional buffer of 20% for the five years due to a record of persistent under delivery. The cumulative housing delivery target for the remainder of the plan period to 2027/28 is therefore a minimum of 11,728 units. The Borough’s current development pipeline from strategic site allocations and developments with planning permission is currently 8,997 units which is 2,731 below the Borough’s supply target.

7.107 In terms of supply, the Council has seen a significant number of existing flats being joined together to create a smaller number of larger units. Whilst the newly created large units will serve a need, the level of loss has implications on the ability of the Council to meet its increase in housing targets. The Council estimates that it has lost nearly 400 dwellings over the last six years to amalgamations.

**Gaps**

7.108 The recent completion of an updated SHMA for the Borough has ensured that the Council has a comprehensive understanding of housing needs within the Borough. There is a requirement for further work on identifying the Borough’s
housing supply, given the Borough’s current pipeline may be insufficient to meet the London Plan target. The Issues and Options consultation includes a call for sites to address this gap, and the Council will undertake a Strategic Housing Land Availability Assessment as part of the future plan preparation process.

Emerging Issues

7.109 The baseline evidence for housing has indicated a number of key issues in terms of housing need, supply and affordability:

- With the highest house prices in the country, the growing affordability ratio between median prices and wages has made significant parts of the Borough unaffordable to all but those on the highest incomes.
- There is an increasing requirement for affordable homes for those on both low and middle incomes. The annual need for affordable housing is greater than the general need arising from the estimated growth in households due to a backlog of those already living in the Borough in need of affordable housing. In some instances, this had led to the Council placing households in accommodation outside of the Borough.
- The Borough has a large number and proportion of second homes. Concentrations of second homes within local neighbourhoods could have a negative impact on the local character and the viability of local services.
- The already dense pattern of development across the Borough will continue to place considerable constraints on the potential supply of land for additional homes.
- The high values and lack of available land to build new homes has led to an increasing demand for amalgamations and de-conversions of flats to houses, which has the impact of reducing the overall supply homes in the Borough, and particularly smaller homes for which the greater need has been identified.
- The Borough has a growing population of residents aged 65 and above for whom there are currently limited options in terms of specialist housing provision.

Likely future trends under the ‘business as usual scenario’

7.110 Should the issues identified continue with the existing policy framework, it is anticipated that the following future trends will emerge:

- Polarisation within the Borough’s house stock due to the middle income households being priced out leaving only a mix of very expensive market housing and social housing.
- An increasing need for affordable housing as the backlog from previous years remains unmet and new households in affordable housing need
arise. There could also be an increasing reliance on locating households in need in accommodation outside of the Borough.

Gypsies and Travellers

Baseline

7.111 A London-wide Gypsy and Traveller Accommodation Needs Assessment\textsuperscript{29} was undertaken for the Mayor of London in 2008 which is now considered largely out of date but contains conclusions for this Borough, provided as Figure 5:

Figure 5: Summary tables for Kensington and Chelsea in the London Boroughs’ GTANA (2008)

\begin{table}[h]
\centering
\begin{tabular}{|l|c|}
\hline
\textbf{Table 12.42 Estimate of the need for residential site pitches, 2007-2012} & \textbf{20} \\
\hline
\textbf{Current residential supply} & \\
\hline
2) Number of unused residential pitches available & 0.0 \\
3) Number of existing pitches expected to become vacant 2007-2012 & 0.3 \\
4) Number of family units in site accommodation expressing a desire to leave London & 0.8 \\
5) Number of family units in site accommodation expressing a desire to live in housing & 1.2 \\
6) Residential pitches planned to be built or brought back into use 2007-2012 & 0.0 \\
7) Supply generated by movement within the stock & 3.0 \\
\hline
\textbf{Total Supply} & 5.3 \\
\hline
\textbf{Current residential need – minimum need} & \\
8) Family units (on pitches) seeking residential pitches in the area, 2007-2012\textsuperscript{*} & 2.0 \\
9) Family units on unauthorised encampments requiring residential pitches & 0.0 \\
10) Family units currently overcrowded on pitches requiring residential pitches\textsuperscript{**} & 1.0 \\
11) New family units expected to arrive from outside London & 0.2 \\
12) New family formations expected to arise from within existing family units on sites & 5.0 \\
\hline
\textbf{Total minimum need} & 8.2 \\
\hline
\textbf{Maximum residential need – maximum figures} & \\
13/14) Family units in housing but with a psychological aversion to bricks and mortar accommodation\textsuperscript{***} & 4.9 \\
\hline
\textbf{Total maximum need} & \textbf{13.1} \\
\hline
\textbf{Balance of Need and Supply} & \\
Minimum additional pitch requirement & 3 \\
Maximum additional pitch requirement & 8 \\
\hline
\multicolumn{2}{|l|}{* annualised figures shown in brackets} \\
\multicolumn{2}{|l|}{\textsuperscript{*} excluding those counted in step 10 \textsuperscript{**} excluding those containing an emerging family unit \textsuperscript{***} including both Roma and non-Roma}
\end{tabular}
\end{table}

\begin{table}[h]
\centering
\begin{tabular}{|l|c|c|c|c|c|}
\hline
\textbf{Summary: pitches required 2007 - 2017} & \textbf{Minimum need} & & & \textbf{Maximum need} & \\
\hline
& Base numbers & Additional need 2007-12 & Additional need 2012-17 & Additional need 2007-12 & Additional need 2012-17 \\
\hline
Unauthorised pitches & 0 & - & - & - & - \\
Residential pitches & 20 & 3 & 3 & 8 & 4 \\
Housing (all) & 25 & 3 & 3 & -1 & 3 \\
Housing (not Roma) & 22 & 2 & 2 & -2 & 2 \\
Housing (Roma) & 3 & 1 & 1 & 1 & 1 \\
\hline
\end{tabular}
\end{table}

\textsuperscript{29} \url{http://legacy.london.gov.uk/mayor/housing/gtana/index.jsp

53}
7.112 The Draft Gypsy and Traveller Accommodation Needs Assessment (GTANA) prepared jointly by RBKC and LBHF identified an indicative need for an additional 10 pitches over 10 years. The Draft GTANA provides much relevant baseline data which will be summarised for this Scoping report.

7.113 Both RBKC and LBHF are jointly responsible for one permanent Gypsy and Traveller site at Stable Way (W10 6QX) which opened in 1975 and currently comprises 20 pitches, of which 1 is taken up by ‘the hut’ centre, resulting in 19 available authorised pitches.

7.114 It is understood that since 2005 only 1 household from the site has been re-housed to 2-bedroom accommodation which was a single female with 2 children in 2014-15. Only 1 household from the site is on the housing register requiring 2-bedroom accommodation.

7.115 The national Count of Traveller Caravans (‘Caravan Count’)^30 by the Department of Communities and Local Government (DCLG) compiles data from local authorities in England providing snapshots of the count of caravans twice a year (January and July). The data from the Caravan Count published in June 2015 for both RBKC and LBHF is set out in Tables 5 and 6:

**Table 5: Count of Traveller caravans, July 2015 (From Table 1 of Caravan Count)**

<table>
<thead>
<tr>
<th></th>
<th>2013</th>
<th>2014</th>
<th>2015</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>January</td>
<td>July</td>
<td>January</td>
</tr>
<tr>
<td>RBKC*</td>
<td>27</td>
<td>32</td>
<td>31</td>
</tr>
<tr>
<td>LBHF*</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

*All socially rented, no other tenures

**Table 6: Traveller and travelling showpeople caravan sites provided by local authorities and private registered providers in England, January 2015 (From Table 2 of Caravan Count)**

<table>
<thead>
<tr>
<th></th>
<th>Total number of pitches†</th>
<th>Caravan capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>RBKC</td>
<td>19</td>
<td>38</td>
</tr>
<tr>
<td>LBHF*</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

†All residential pitches, none transit

7.116 The 2011 Census provides a wealth of baseline data for those who identify themselves as Gypsy or Irish Traveller ethnic group.

7.117 217 people in LBHF (0.12%) and 119 in RBKC (0.08%) identified themselves as Gypsy or Irish Traveller ethnic group, totalling 336 across the two Councils (0.1% of total population).

7.118 Three wards in the north of LBHF have the highest number of Gypsy and Irish Traveller population; Wormholt and White City (45, 0.34%), Askew (31, 0.22%) and College Park and Old Oak (19, 0.21%).

7.119 Three wards in the north of RBKC have the highest number of Gypsy and Irish Traveller population; Notting Dale (35, 0.37%), St Helen’s\(^{31}\) (13, 0.14%) and Colville (10, 0.12%).

7.120 28% of the Gypsy or Irish Traveller population is under 16. This is lower when compared to 34% in London and 32% in England but higher when compared to all ethnic groups across the two Councils at 15.8%.

7.121 Gypsy or Irish Travellers had the lowest proportion of any ethnic group who rated their general health as ‘good’ or ‘very good’ at 65% compared to 86% across all ethnic groups. Nearly 31% reported to have a long-term health problem or disability that limits their day-to-day activities (compared to 12.5% for all ethnic groups in the area).

7.122 Within a Gypsy or Irish Traveller family household in the two Council areas, the most common family type (Figure 6) was those who were lone parents at 27.6% which is nearly three times that for the whole population in the area at 9.7%. 38% of Gypsy or Irish Traveller households had dependent children, which is above the average for the area at 21%.

Figure 6: Household composition of Gypsy or Irish Traveller residents in RBKC and LBHF\(^{31}\) (Source: 2011 Census, ONS)

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\(^{31}\) Formerly St Charles (approximation)
7.123 Flat, maisonette or apartment was the most common type of accommodation for Gypsy or Irish Travellers at 66%; (Figure 7) this is lower than for all residents in the two Councils area at 80%. According to the 2011 Census data, there were 18 caravans or other mobile or temporary structure in the area and they account for 14% of all Gypsy or Irish Traveller accommodation; this compares to 10% in London and 23% in England as a whole.

Figure 7: Proportion of dwelling types of Gypsy or Irish Traveller residents (Source: 2011 Census, ONS)

7.124 Gypsy or Irish Travellers were more than twice as likely to live in social housing than the overall population (58% compared to 28%) and less likely to own their accommodation outright (7% compared to 18%).

7.125 The percentage of Gypsy or Irish Traveller households that have one fewer bedroom than required was 20.5% (20% in London and 17% in England); this compares to 10.3% across the overall population of the two Councils.

7.126 Gypsy or Irish Traveller was the ethnic group with the lowest proportion of respondents who were economically active at 40.9%; this rate is lower than that of Gypsy or Irish Travellers in London at 46.4% and England at 47.1%.

7.127 53% of those who were economically active were employed and 13% were unemployed. The Gypsy or Irish Traveller group had the highest proportion of self-employed out of the ethnic groups at 30% compared to 13% for all groups across the two Councils.

7.128 The most common reason for Gypsy or Irish Travellers being economically inactive was long term sick or disabled at 36.4%. Gypsy or Irish Travellers
were among one of the highest providers of unpaid care at 12.8% (two Councils average 6.8%) and were the highest proportion of people providing 50 hours or more unpaid care per week at 6% compared to 1.3% across all ethnic groups (5.3% in London and 4.9% in England).

7.129 Gypsy or Irish Travellers had the highest proportion with no qualifications for any ethnic group at 48%, which is over four times higher than for the two Councils areas as a whole (11.5%).

7.130 There is a greater proportion (43%) of Gypsy or Irish Travellers who have never worked across the two Council areas than both London (33.2%) and England as a whole (27.8%).

7.131 The Kensington and Chelsea Tenant Management Organisation (KC TMO) Site Manager maintains records of the numbers of people listed as residents at the site, which currently stands at 80. Between May 2011 and February 2014, 10 people have been on the waiting list for pitches at Stable Way but 2 people moved off the site to bricks and mortar accommodation and so there remain 8 people on the waiting list. The Site Manager also has 2 incidents recorded where debris from traffic on the flyover has landed on the site.

7.132 The Draft GTANA also provides a wealth of baseline data based on a survey of residents at the Stable Way site undertaken in September 2014 the key findings were as follows:

- Four respondents out of the 18 stated that they had sufficient space for the number of homes on their pitch (22%), with the remaining 14 (78%) stating that they did not have enough space. Three respondents out of the 18 stated that they had sufficient room for additional caravans, mobile or motor homes (17%).
- Eleven respondents stated that they had additional space needs because friends, relatives or others want to stay for temporary periods. Most of these visits occur at various times across the year. Two respondents stated that they would need eight additional beds due to temporary visitors.
- There would also be an additional burden on car and van parking with only one respondent stating that they would have temporary visitors without any additional cars or vans.
- Five respondents out of the 18 stated that they are looking for somewhere else to live (28%), with the remaining 13 stating that they were not looking to move.
- Two stated that they wanted to move on the same site, with two respondents stating they would like to move elsewhere in London and elsewhere in the United Kingdom. Two respondents stated that there would be four homes vacated, and one indicated one home would be vacated.
- Two respondents stated that if they could find a house or flat now they would move. Two respondents did not answer the question with the remaining 14 respondents stating that they would not want to move into a house or flat if one was available.
- Four respondents stated that they would like or need to move now (22%), three did not provide an answer, with 11 stating they had no need to move (61%).
- Nine out of the 18 respondents have identified that they will require new homes at some point in the next five years.

7.133 In total, respondents stated that 20 new homes will be needed. One pitch has stated that four new homes will be needed. Two pitches have stated that three new homes will be needed, four homes have stated two new homes are needed; with two respondents stating that they need one new home. 13 of the 20 homes would consider accommodation on the existing site.

7.134 Figure 8 analyses the number of people per ‘home’ (as in caravan, mobile home or motor home). In total, there are currently 30 homes on the site, with 73 people recorded as living in those. This equates to an average of 2.43 people per home. There are 1.3 children aged under 18 per home and 1.13 adults per home.

7.135 As above, there are nine households indicating that they have future housing needs in the next five years. For those households there are 2.11 people per home, compared to 3 for those households without an identified future housing need.

7.136 There are 1.37 children per home among those pitches identifying a future housing need compared to 1.45 children among those without a future housing need. There are 0.74 adults per home among those pitches with an identified future housing need compared to 1.55 among those without a future housing need in the next five years.
7.137 Figure 9 shows what type of accommodation respondents who identified a future need would consider, 13 of the 20 homes would consider accommodation on the existing site.
Eight households would consider another Council or housing association managed site, and eight stated they would consider group housing.

In terms of the ‘supply’ of potential Gypsy and Traveller accommodation sites, the Council is undertaking a ‘call for sites’ as part of the Issues & Options consultation.

Emerging Issues

The emerging issues are set out in the ‘baseline data’ section set out above. The key emerging issue is that of continuing to meet the accommodation needs of Gypsies and Travellers.

Likely future trends under the ‘business as usual scenario’

If any identified accommodation needs are not met, then overcrowding of the existing Stable Way Gypsy and Traveller site may occur with negative impacts on the residents.

However, the existing Local Plan policy does not necessarily prevent planning permission being granted for new Gypsy and Traveller accommodation sites in the Borough (subject to certain criteria and other Local Plan policies being met) and so any identified accommodation needs could potentially be met through planning permissions.
Access and space housing standards

Baseline

7.143 The Government has taken steps to rationalise housing standards to simplify regulatory costs and burdens on development as part of a package of measures to help boost house building, known as the national ‘Housing Standards Review’. The Government published a Written Ministerial Statement (WMS) in March 2015 which outlined policy and announced that Councils should not set any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings over and above the national ones.

7.144 The Government has withdrawn the Lifetime Homes standard and replaced this with a new approach that introduces ‘optional’ building regulations requirements for access. A nationally described space standard has also been introduced which can be implemented through the planning system rather than the building control system.

7.145 These national changes affect criterion (b) of Policy CH2: Housing Diversity which deals with housing space standards, lifetime homes and disabled access.

7.146 The Mayor of London has commenced Minor Alterations to the London Plan (MALP) to update London Plan policies in light of the national Housing Standards Review. Once adopted these changes to the London Plan will become part of the Council’s development plan. The MALP have been submitted for examination and hearings took place in late October 2015. It is anticipated that if the MALP are found ‘sound’ by the Planning Inspector they will be adopted in early 2016.

7.147 MALP Policy 3.8: Housing Choice proposes 90% of new housing meets Building Regulation requirement M4 (2) ‘accessible and adaptable dwellings’ and 10% of new housing meets Building Regulation requirement M4 (3) ‘wheelchair user dwellings’, i.e. is designed to be wheelchair accessible M4 (3) (2) (b), or easily adaptable for residents who are wheelchair users M4 (3) (2) (a).

7.148 In terms of Local Plan policy, a policy requiring 90% of all new dwellings to be M4(2) ‘accessible and adaptable dwellings’ and 10% M4(3) ‘wheelchair user dwellings’ may seem to be a reasonable option. This is because this approach is similar to the Council’s existing policy. The Building Regulations compliance can only be assessed against a single requirement i.e. M4(2) or M4(3), therefore the 90% and 10% split ensure continuation of the existing policy which was adopted in 2010 and was based on evidence.
In terms of the space standards, the Government has published a new nationally described space standard. This cannot automatically be used by Councils but needs to be included in a local policy taking account of need and viability. The Council cannot produce its own space standards that are different to the national ones. The Council’s existing reasoned justification to Policy CH2: Housing Diversity refers to the space standards in the London Plan.

The nationally described space standards are very similar to the ones in the London Plan but have a reduced minimum floor to ceiling height of 2.3m for 75% of the gross internal area rather than the 2.5m in the existing London Plan.

The MALP propose to adopt the Nationally Described Space Standards (paragraph 3.36, MALP) with just one small change which is to strongly encourage a minimum ceiling height of 2.5m for at least 75% of the gross internal area. This is to cater to the unique circumstances in London with a prevalence of flatted development.

It remains to be seen if these changes are adopted but assuming that these are, they will form part of the Council’s development plan in the future. There will be no benefit in duplicating MALP, therefore the Council does not propose to separately adopt the nationally described housing standards. Having an alternative approach is not an option as this will conflict with national policy.

Gaps

Since London Plan is part of the Council’s development plan the Council can start using the proposed MALP policy on access when adopted. Following consultation the Council can review the responses to establish if a locally tailored approach is needed.

Emerging Issues

A fully ‘wheelchair accessible’ dwelling M4 (3) (2) (b) can only be required where the Council is responsible for allocating or nominating a person to live in that dwelling. It is unlikely that local authority nomination rights would be known at the planning application stage for most schemes. Therefore requiring 10% of all dwellings to be ‘wheelchair adaptable’ M4 (3) (2)(a) would be more realistic in most cases. Where there is an identified need, on a case-by-case basis a proportion of affordable units can be ‘wheelchair accessible’ M4 (3) (2) (b).

M4 (2) of Building Regulations is seen as an equivalent of ‘Lifetime Homes’ standard. However, to comply with requirement M4 (2), step free access must

be provided. Generally this will require a lift where a dwelling is accessed above or below the entry storey. The application of requirement M4 (2) has particular implications for blocks of four storeys or less, where historically the London Plan has not required lifts. Boroughs should seek to ensure that units accessed above or below the entry storey in buildings of four storeys or less have step-free access. However, this requirement may be subject to development-specific viability assessments and consideration should be given to ongoing maintenance costs.

Likely future trends under the ‘business as usual scenario’

7.156 Continuing with the ’business as usual scenario’ i.e. the pertinent criteria of the existing Policy CH2 is not an option in light of national policy outlined above. Therefore there is no benefit in attempting to predict trends under a business as usual scenario.
Climate change: energy and water housing standards

Baseline

7.157 The Government has taken steps to rationalise housing standards to simplify regulatory costs and burdens on development as part of a package of measures to help boost house building, known as the national ‘Housing Standards Review’. The Government published a Written Ministerial Statement (WMS) in March 2015 which outlined policy and announced that Councils should not set any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings over and above the national ones. In the WMS the Government also announced that the Code for Sustainable Homes had been withdrawn.

7.158 In terms of energy standards these national changes affect those criteria of Policy CE1 Climate Change which set standards for housing. As a transitional measure the Government advice is that Councils can continue to ask for energy standards that are the equivalent of Code for Sustainable Homes Level 4. This approach can be followed until commencement of amendments to the Planning and Energy Act 2008 introduced in the Deregulation Act 2015. This is expected in late 2016. It is expected that in the future energy standards for new housing will be governed by Building Regulations only unless the Government makes any further changes to the approach in the interim.

7.159 In terms of standards for water efficiency, these were also part of the Code for Sustainable Homes. The Government has introduced an ‘optional’ housing standard related to water consumption in Building Regulations Part G which requires the consumption of wholesome water in a new dwelling not to exceed 110 litres per person per day. The Council has been requiring this level of water consumption by using the Code for Sustainable Homes Level 4.

7.160 The Mayor of London has commenced Minor Alterations to the London Plan (MALP) to update London Plan policies in light of the national Housing Standards Review. This includes Policy 5.15 B. b. which in effect includes the above target level of water consumption across London. Once adopted these changes to the London Plan will become part of the Council’s development plan. The MALP have been submitted for examination and hearings took place in late October 2015. It is anticipated that if the MALP are found ‘sound’ by the Planning Inspector they will be adopted in early 2016.

7.161 There will be no benefit in duplicating MALP, therefore the Council does not propose to include a specific policy on water consumption in new dwellings within the Revised Draft Local Plan. The Council will be including a standard
condition based on the adopted MALP to trigger the ‘optional’ Building Regulations requirement.

Gaps

7.162 There are no gaps in the baseline as this issue is governed by national policy. However, the Council will continue to closely monitor emerging Government policy/guidance on this aspect and make corresponding local planning policy changes if needed.

Emerging Issues

7.163 Given the Government policy in terms of withdrawing the Code for Sustainable Homes and national policy that Councils should not be setting standards that are more onerous than Building Regulations, it seems the only option available to the Council is to delete references to the Code and BREEAM for housing from Local Plan Policy CE1.

Likely future trends under the ‘business as usual scenario’

7.164 Continuing with the ‘business as usual scenario’ i.e. the pertinent criteria of the existing Policy CE1 is not an option in light of national policy outlined above. Therefore there is no benefit in attempting to predict trends under a business as usual scenario.
Flooding and drainage

Baseline

Fluvial and tidal flooding

7.165 The Royal Borough of Kensington and Chelsea lies to the north of the river Thames. The Thames barrier offers defence against flooding for all London Boroughs with borders to the Thames. There is no fluvial flood risk in the Borough. However, the Borough is affected by tidal flood risk, ranging from Flood Zone 1 with low probability of flooding to Flood Zone 3 with high probability of flooding. The majority of the Borough is located within Flood Zone 1, with a 1 in 1,000 year risk of flooding. The south of the Borough is at risk from flooding by the Thames, with the wards of Cremorne and Royal Hospital containing areas of Flood Zone 2 and Flood Zone 3. The wards of Redcliffe, Earls Court and Stanley to the south west of the Borough also fall within this area of Flood Zone 2. The ward of Holland, in the west of the Borough, contains an area of Flood Zone 2. 92% of the Royal Borough has less than 0.1% probability of flooding in any year, 2% of the Borough has 0.1%-0.5% probability of flooding and only 6% has high probability of flooding - mainly areas adjacent to the Thames river. There are 4,823 properties (6% of all properties) at risk of tidal flooding. Approximately 92% of the properties at risk of flooding are residential.

Surface and sewer flooding

7.166 The main risk of flooding that the Borough faces is flooding from sewer and surface water. 373 properties flooded as a result of heavy rainfall causing surface and sewer water flooding on 20th July 2007. The Strategic Flood Risk Assessment was reviewed in 2014 and a Surface Water Management Plan was also produced. These documents designated 4 Critical Drainage Areas (CDAs) in the Borough due to their potential risk of flooding from surface and sewer water flooding (Figure 10).

7.167 Analysis of the number of properties at risk of flooding was undertaken for the rainfall event with a 1 in 100 probability of occurrence in any given year. A review of the results predicts that over 20,000 properties in the Borough could be at risk of surface water flooding of a depth greater than 0.1m during a 100 year rainfall event (above an assumed 0.1m building threshold),

7.168 Thames Water has identified a 17% increase in the amount of impermeable area in the Borough between 1971 and 2009, which increases the amount of rainfall discharging to the storm water sewer. This, together with rainfall from authorities in the north of the catchment such as Camden and Brent, may contribute to surface water and sewer flooding, as the Counters Creek sewer
does not currently have the capacity to discharge storm water during extreme rainfall events. Thames Water is currently looking at improving capacity in the Counters Creek storm water sewer in about 2020. The risk of surface and sewer flooding is increased by the use of impermeable surfaces as they decrease the capacity of the ground to drain water.

**Figure 10: Critical Drainage Areas with Predicted 1 in 100 year Surface Water Flood Event Depths (>0.1m)**

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**Groundwater**

7.169 The SWMP shows areas which could potentially suffer from groundwater. There is a groundwater source protection zone in the south east area of your Borough (Brompton area). These zones, designated by the Environment Agency, refer to groundwater sources such as wells, boreholes and springs used for public drinking water supply. The zones show the risk of contamination from any activities that might cause pollution in the area. The southern half of Kensington and Chelsea falls within a Groundwater Vulnerability Zone, which is categorised as ‘Minor aquifer – high vulnerability’.

**Gaps**

7.170 No data gaps have been identified. However, although there is detailed information regarding fluvial and tidal, surface and sewer water flooding
areas, this cannot be said for groundwater. The SWMP shows areas which could potentially suffer from groundwater flooding but it is not possible to predict and model groundwater flooding accurately. Given the nature of groundwater, more detailed information is unlikely to be available in the near future.

**Emerging Issues**

**Critical Drainage Areas**

7.171 As new CDAs have been designated, the issue is to manage flood risk in these areas for different land uses with different vulnerability classification.

**Flood risk protection and prevention issues**

7.172 As more information has emerged since 2010 as outlined above, it is important to ensure that the right protection measures are required for properties at risk of flooding.

**Surface water run-off and Sustainable Drainage Systems (SuDS)**

7.173 The Council needs to make sure that in light of changes in legislation planning policies are up to date to reduce surface water run-off through the provision of SuDS.

**Water infrastructure projects**

7.174 A national infrastructure project, the Thames Tideway Tunnel, got development consent in 2014. Two of the sites for the project are in the south of the Borough along the River Thames. The previous policy addressed the Thames Tideway Tunnel but it did not address any other major water infrastructure project. Since then Thames Water is planning a storm relief sewer, ‘the Counters Creek Storm Relief Sewer’ which will be at planning stage in late 2016. It may be appropriate for the Council to have a policy on these types of projects, should any future water infrastructure projects come forward.

**Likely future trends under the ‘business as usual scenario’**

7.175 Predicting the nature of future trends is difficult. Doing so is dependent on multiple factors, including the global, European and national climate, and decisions which are taken at regional, national and European level. However, flood incidents have the potential to seriously affect people’s lives and businesses, and the outcomes can be devastating.

7.176 Under current policy, the Council is able to address flood risk by requiring flood risk mitigation measures and the provision of Sustainable Drainage
Systems when development is put forward. However, in order to reduce flood risk, more targeted policies may be required.

7.177 Reduction to flood risk and flood prevention measures are likely to have a positive impact in most sustainability objectives except from heritage assets (depending on the measures included). SuDS should have a very positive effect on biodiversity if more green SuDS are proposed.
Waste

Baseline

7.178 Tonnages for recycling and residual waste in the Borough have recently been heading in the wrong direction and have been lower than forecast, in common with some other local authorities. Between 2013/14 and 2014/15 overall waste (municipal waste) tonnages rose by 0.29%. General waste (municipal residual waste) increased by 0.72% and recycling tonnages decreased by 1.37%. Given that residual waste treatment is more expensive than recycling, shifting waste from the residual waste stream to the recycling stream will not only save money, it will also improve recycling rates.\(^{33}\)

7.179 The Western Riverside Waste Authority Waste Planning Authorities (WRWA WPAs) Waste Apportionments Engagement Statement provides much relevant baseline data for waste apportionments which will be summarised for this Scoping report.

7.180 The Council collects over 60,000 tonnes of municipal waste every year\(^{34}\). As set out in section 3, the London Plan’s apportionment figure for the Borough is 194,000 tonnes per annum by 2031 which, assuming approximately 80,000 tonnes per annum capacity per hectare, requires 2.4 hectares of land to manage this waste.

7.181 The emerging joint waste evidence base work has so far determined that, even when pooling apportionments and capacity, the WRWA WPAs are not able to jointly meet their London Plan waste apportionment capacities as a single entity, with a shortfall of approximately 504,433 tonnes of waste per annum.

7.182 The Council is statutorily required to deliver its municipal waste to places as directed by WRWA. Currently all of the municipal waste goes to WRWA facilities in Wandsworth for transfer and treatment (Western Riverside Transfer Station near Wandsworth Bridge and Cringle Dock Transfer Station next to Battersea Power Station). Since 2011, recyclables go to a Materials Recycling Facility at Smugglers Way in Wandsworth and residuals are barged down river to the Riverside Resource Recovery Limited (RRRL)’s facility at Belvedere, in the London Borough of Bexley where the waste is incinerated to generate electricity. It is the largest Energy from Waste (EfW) facility in the UK and one of the largest in Europe, which will eventually generate up to 72MW of power. This is confirmed by the WRWA’s Waste Policy Statement (July 2013)\(^{35}\) which also states that the facility can handle 670,000 tonnes of waste.

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\(^{33}\) Waste Innovation Group Research Project

\(^{34}\) RBKC, 2015

per year although the WRWA supplies around 300,000 tonnes of residual waste to it (paragraphs 11-12).

This contract is understood to run until 2031 meaning that, in reality, waste arisings from the Borough and the other WRWA WPAs are dealt with in Bexley.

Gaps

Consideration of other waste streams, as identified in the National Planning Policy for Waste (NPPW) and National Planning Practice Guidance (NPPG) on Waste, will be taken forward as part of future evidence base work between the WRWA WPAs.

In terms of the ‘supply’ of potential waste sites, the Council is undertaking a ‘call for sites’ as part of the Issues & Options consultation. Further data on the potential waste ‘throughput’ of sites will also be gathered to inform the next iteration of the WRWA WPAs’ joint evidence base.

Emerging Issues

The emerging issues are set out in the ‘baseline data’ section set out above. The key emerging issue is that of being able to meet the waste apportionment figure of the London Plan.

A further emerging issue relates to the future use of existing waste sites in the recently-established Old Oak and Park Royal Development Corporation (OPDC) as part of major mixed-use development proposed in that area. This impacts on the ability of LBHF to meet its own waste apportionment target and, consequently, the ability of the WRWA WPAs (including RBKC) in meeting a joint apportionment target.

Likely future trends under the ‘business as usual scenario’

Whilst emerging trends relating to the future use of existing waste sites in the OPDC area suggest that the WRWA WPAs may not collectively be able to meet their waste apportionment targets, in reality, as set out above, the WRWA has a contract running until 2031 for waste arisings in its area to be dealt with in Bexley.

Links to Plan Monitoring

The baseline indicators investigated as part of the SA process can inform the choice of indicators for monitoring the Local Plan. The Council has a monitoring framework in Chapter 38 of the Consolidated Local Plan. This framework will be reviewed in light of any new issues arising from the baseline.
Q 2: Do you have any comments on the accuracy, scope and coverage of the baseline data or know of any further data or indicators that might provide useful information? If so, please provide details.
8. A3. Identifying Sustainability Issues and problems

8.1 Task A3 involves drawing on the evidence gathered in Tasks A1 and A2 to identify those sustainability issues that are most pressing. The sustainability issues identified then form the basis for developing a robust SA framework (Task A4). Furthermore, the sustainability issues are a useful source of evidence to draw upon at the assessment stage.

8.2 Table 7 presents the issues that were identified in the Core Strategy Sustainability Appraisal Report 2009 (shown in blue text) and any new issues arising from the review of baseline and PPPSIs have been added to this (shown in red text). Given the issues identified are very similar to the ones identified at the time of the work on the Core Strategy, it is considered that they are still relevant at the present time.

Table 7: Key Sustainability Issues

<table>
<thead>
<tr>
<th>Sustainability Problem</th>
<th>Supporting evidence</th>
</tr>
</thead>
</table>
| Economic Deprivation – some wards amongst the most economically deprived in the country in particular, north of the Westway and SW Chelsea. | RBKC Inception Meeting (10 – 02 – 05)  
Proportion of people of working age in employment  
Income Indices of deprivation - Clear inequalities between the North and the South of the Borough with many SOA’s being in the bottom 10% of those in the UK.  
Index of multiple deprivation shows a clear delineation between north and south.  
IMD 2015 shows that there is still a clear north south divide in the Borough and the issue described remains. |
<p>| Shortage of small office units, &lt;300m2 and particularly &lt;100m2. | RBKC Inception Meeting (10 – 02 – 05) |
| Shortage of office units across the Borough. | Market and Viability Assessment, Frost Meadowcroft (2014) |</p>
<table>
<thead>
<tr>
<th>Sustainability Problem</th>
<th>Supporting evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Average house prices</td>
<td>Average house prices the highest in the UK at over £700,000, creating a barrier to entry for low and medium level earners. Median house prices in the Borough have increased at the highest rate in the country since the Local Plan was first adopted (as the Core Strategy) in 2010 (60%) leading to highest median house price in England of £1.2 million in 2014. Therefore the barrier to entry for low and medium level earners remain the same as before.</td>
</tr>
<tr>
<td>Environment</td>
<td></td>
</tr>
<tr>
<td>Air quality – the whole Borough is a declared AQMA for both PM10 and NO2</td>
<td>RBKC Inception Meeting (10 – 02 – 05) Days when concentrations of PM10 exceed 50 μg/m3 Annual mean PM10 concentrations Annual mean NO2 concentrations No of times 1-hour concentration of NO2 exceed 200 μg/m3</td>
</tr>
<tr>
<td>Open Space – there is a shortage of open space in the Borough, and a shortage of areas in which to create additional open space.</td>
<td>RBKC Inception Meeting (10 – 02 – 05) Open space per resident ha / resident – Second lowest proportion of open space to total land areas and lowest per population in London and the UK24</td>
</tr>
<tr>
<td>Sustainability Problem</td>
<td>Supporting evidence</td>
</tr>
<tr>
<td>-------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Noise and Vibration – 10,000 noise complaints last year (2004)</td>
<td>RBKC Inception Meeting (10 – 02 – 05)</td>
</tr>
<tr>
<td>Traffic – two thirds more parking permits issued than parking spaces.</td>
<td>RBKC Inception Meeting (10 – 02 – 05)</td>
</tr>
<tr>
<td>Waste – RBKC not meeting recycling targets</td>
<td>RBKC Inception Meeting (10 – 02 – 05)</td>
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<tr>
<td></td>
<td>Cost of waste collection per household is increasing and higher than London levels</td>
</tr>
<tr>
<td></td>
<td>Household waste - percentage recycled, Household waste - percentage composted, Household waste - percentage of heat all below UK and London averages</td>
</tr>
<tr>
<td></td>
<td>Adequate waste and recycling storage in new builds / housing conversions / office space (also to include community composting?)</td>
</tr>
<tr>
<td>Area of sites of conservation value</td>
<td>Bird Populations in decline</td>
</tr>
<tr>
<td></td>
<td>Loss of sites of conservation value.</td>
</tr>
<tr>
<td>Public Transport Accessibility Levels (PTALs) are lowest in Kensal and West Chelsea.</td>
<td>WebCAT Public Transport Accessibility Map – TfL (2011)</td>
</tr>
<tr>
<td>Sewer Flooding due to lack of capacity in the Counter’s Creek combined sewer system.</td>
<td>Thames Water has identified a 17% increase in the amount of impermeable area in the Borough between 1971 and 2009, which increases the amount of rainfall discharging to the storm water sewer.</td>
</tr>
<tr>
<td>Social</td>
<td>RBKC Inception Meeting (10 – 02 – 05)</td>
</tr>
<tr>
<td>Housing – the availability of low cost, affordable housing</td>
<td>Average house prices – highest in the UK at over £700,000.</td>
</tr>
<tr>
<td></td>
<td>Homelessness – upward trend in the numbers of homeless since 2000/2001</td>
</tr>
<tr>
<td></td>
<td>House prices continue to be the highest in the UK with median house</td>
</tr>
<tr>
<td>Sustainability Problem</td>
<td>Supporting evidence</td>
</tr>
<tr>
<td>--------------------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Health - Shortage of Doctors Surgeries and GPs</td>
<td>RBKC Inception Meeting (10 – 02 – 05)</td>
</tr>
<tr>
<td>Education – Monitoring of education performance in the Borough proposed Need for secondary school in the SW of the Borough.</td>
<td>RBKC Inception Meeting (10 – 02 – 05)</td>
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<tr>
<td></td>
<td>% of pupils achieving one or more GCSEs at grade G or equivalent – at national average in 2003/2004</td>
</tr>
<tr>
<td></td>
<td>No. of pupils per 1,000 permanently excluded from primary schools – increased by nearly 200% from 2001/2002 levels in 2003/2004</td>
</tr>
<tr>
<td>Community Facilities – lack of elderly person homes (Care Homes).</td>
<td>RBKC Inception Meeting (10 – 02 – 05)</td>
</tr>
<tr>
<td>Housing and Community Facilities – growth in the proportion of population aged over 65</td>
<td>GLA Household Projections - Households aged 65 and over will increase from 14% in 2012 to 23% in 2037, a rise from 10,900 to 20,000 in absolute terms.</td>
</tr>
<tr>
<td>Crime</td>
<td>RBKC Inception Meeting (10 – 02 – 05)</td>
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<tr>
<td></td>
<td>Total notifiable offences are declining, however, there have been increases in sexual offences, burglary, fear of crime is higher than England and Wales averages and drug offences are on the increase.</td>
</tr>
<tr>
<td>Accommodation needs of Gypsies and Travellers</td>
<td>Draft GTANA identifies there is a need for an additional 10 pitches over 10 years.</td>
</tr>
</tbody>
</table>

**Q 3: Do you have any comments on the sustainability issues and problems identified for the Borough or know of any further issues and problems that should be included?**

9.1 In terms of an assessment framework it is considered that the SA process is well established and is fundamentally based on an objectives-led approach whereby the potential impacts of a plan are gauged in relation to a series of aspirational objectives for sustainable development. In other words, the objectives provide a methodological yardstick against which to assess the effects of the plan. It is considered that this approach can be transposed into undertaking an IIA.

9.2 The IIA framework will follow Regulation 12 (2) of the Environmental Assessment of Plan and Programme Regulations 2004 in assessing impacts. This states that where an environmental assessment is required –

“(2) The report shall identify, describe and evaluate the likely significant effects on the environment of—

(a) implementing the plan or programme; and
(b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.

(3) The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of—

(a) current knowledge and methods of assessment;
(b) the contents and level of detail in the plan or programme;
(c) the stage of the plan or programme in the decision-making process; and
(d) the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.”

IIA Objectives

9.3 The starting point in setting out the IIA objectives are the SA objectives which were used for the Core Strategy. It should be noted that the SA objectives are distinct from the Core Strategy (now called the Consolidated Local Plan 2015) objectives though they may in some cases overlap with them. SA objectives should focus on outcomes (or ends), not on how the outcomes will be achieved (inputs or means), as development plan objectives will often tend to do.
9.4 The SA objectives were derived as part of the SA/SEA process for the Core Strategy. These were primarily drawn from the original sustainability issues identified at Task A3, but also taking account of other evidence gathered at Tasks A1 and A2 in the 2009 Sustainability Appraisal. The SA objectives were also derived from the Sustainable Development Framework for London (SDFL), developed by the London Sustainable Development Commission\(^3^6\).

9.5 This Scoping Report updates Tasks, A1, A2 and A3. Clearly the SA objectives should take into account the messages emerging from updated tasks A1, A2 and A3 of the SA process (see Figure 11). Having reviewed the updated Tasks A1, A2 and A3, it is considered that the original SA objectives continue to be relevant to assess the social, environmental and economic impact of the planning policies being reviewed including any reasonable alternative options. Table 7 above shows the updated key sustainability issues.

9.6 It should be noted that objective 4 is “to encourage social inclusion (including access), equity, the promotion of equality and a respect for diversity” and objective 15 is “to ensure the provision of accessible health care for all Borough residents”. It is considered that these objectives provide an overarching framework for undertaking the Equalities Impact Assessment and Health Impact Assessment respectively of the emerging policies and reasonable alternatives. The remit of Objective 4 can be expanded to include the ‘protected characteristics’ set out in Section 4 of the Equality Act 2010. These are –

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

\(^3^6\) http://www.londonsdc.org/
9.7 The IIA objectives as derived from the SA process for the Core Strategy are set out below. These objectives could be updated following consultation on this scoping report.

<table>
<thead>
<tr>
<th>IIA objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. To conserve and enhance the natural environment and biodiversity</td>
</tr>
<tr>
<td>2. To reduce crime and anti-social behaviour and the fear of crime</td>
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<tr>
<td>3. To support a diverse and vibrant local economy to foster sustainable</td>
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<tr>
<td>economic growth</td>
</tr>
<tr>
<td>4. To encourage social inclusion <em>(including access)</em>, equity, the promotion</td>
</tr>
<tr>
<td>of equality and a respect for diversity</td>
</tr>
<tr>
<td>5. To minimise effects on climate change through reduction in emissions,</td>
</tr>
<tr>
<td>energy efficiency and use of renewables and adopt measures to adapt to</td>
</tr>
<tr>
<td>climate change</td>
</tr>
<tr>
<td>6. To reduce the risk of flooding to current and future residents</td>
</tr>
<tr>
<td>7. To improve air quality in the Royal Borough</td>
</tr>
<tr>
<td>8. To protect and enhance the Royal Borough’s parks and open spaces</td>
</tr>
</tbody>
</table>
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

Q4: Do you have any comments on the IIA objectives or know of any further IIA objectives that should be considered?

Assessment Methodology

9.8 It is ultimately the responsibility of the body conducting the SA (in this case the Council) to determine whether the effects of the plan are likely to be significant. Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004 provide criteria for assessing the significance of environmental effects (see Appendix 1).

9.9 When determining the significance of the effect of a policy, LPAs may need to consider the probability, duration, frequency and reversibility of the effects, including cumulative, secondary and synergistic effects. The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected) need to be considered. The value and vulnerability of certain areas and populations may also influence the assessment, particularly where thresholds or standards, may be exceeded.
9.10 The nature, impact and potential significance of the impacts will be assessed using a standard scoring approach which was used for the original Core Strategy SA and is summarised in the table below.

**Appraisal Scoring Symbols**

<table>
<thead>
<tr>
<th>Symbol</th>
<th>Likely effect against the IIA Objective</th>
</tr>
</thead>
<tbody>
<tr>
<td>++</td>
<td>Significant positive benefit</td>
</tr>
<tr>
<td>+</td>
<td>Some positive benefit</td>
</tr>
<tr>
<td>0</td>
<td>No significant effect</td>
</tr>
<tr>
<td>X</td>
<td>Some adverse effect</td>
</tr>
<tr>
<td>XX</td>
<td>Significant adverse effect</td>
</tr>
<tr>
<td>?</td>
<td>Uncertain or insufficient information on which to determine</td>
</tr>
</tbody>
</table>

9.11 When determining the likely significance of effects for the Core Strategy policies, consideration was given to the characteristics of the effects and the sensitivity of the receptors involved. For example, the following can all determine whether effects may be significant:

- Probability, duration, frequency and reversibility of effects;
- Cumulative nature of effects;
- Magnitude and spatial extent of the effects; and
- Value and vulnerability of area likely to be effected.

9.12 The Core Strategy Sustainability Appraisal was undertaken on the following main elements of the Spatial Strategy and Delivery Strategy: Strategic Objectives, Places, Strategic Sites and Development Management Policies as shown in Figure 12.

9.13 It is proposed that the same approach can be used while reviewing the emerging policies.
Figure 12: Four main elements of the Core Strategy appraisal

Q5: Do you have any comments on the assessment framework?
10. A5. Consulting on the scope of the IIA

10.1 The Council has a statutory duty to consult the SA/SEA “consultation bodies”, which are Historic England, Natural England and the Environment Agency\(^37\) on the scope of the assessment contained in this Scoping Report. The “consultation bodies” can respond within 5 weeks\(^38\). The NPPG reaffirms this.

10.2 Therefore the Council will specifically consult the consultation bodies (Historic England, Natural England and the Environment Agency) but also make the Scoping Report available alongside the consultation documents on the Issues and Options for the Local Plan Partial Review. This will enable any interested stakeholder to comment.

10.3 This report focuses primarily on tasks A1 – A4 and when commenting on this report, respondents are asked to consider the key questions which are set out in the relevant sections of the report, these are also set out below –

| Q1 | Are there any other Policies, Plans, Programmes, Strategies and Initiatives (PPPSIs) which should be considered for review? |
| Q2 | Do you have any comments on the accuracy, scope and coverage of the baseline data or know of any further data or indicators that might provide useful information? If so, please provide details. |
| Q3 | Do you have any comments on the sustainability issues and problems identified for the Borough or know of any further issues and problems that should be included? |
| Q4 | Do you have any comments on the IIA objectives or know of any further IIA objectives that should be considered? |
| Q5 | Do you have any comments on the assessment framework? |

10.4 Consultation responses can be sent on-line using the following link or sent directly to the contact officer by email or post before the closing date - 9 February 2016:

**Online:** https://planningconsult.rbkc.gov.uk/

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\(^37\) R4(1), The Environmental Assessment of Plans and Programmes Regulations 2004; para.15, NPPG SEA & SA

\(^38\) R12(5)-(6); para.14 NPG SEA & SA
Contact officer:

Preeti Gulati Tyagi  
Senior Planning Officer  
Planning and Borough Development  
The Royal Borough of Kensington and Chelsea  
The Town Hall  
Hornton Street  
London W8 7NX  
Tel: 0207 341 5784

Email: preeti.gulatityagi@rbkc.gov.uk
Appendix 1: Schedule 1 - The Environmental Assessment of Plans and Programmes Regulations 2004

SCHEDULE 1

CRITERIA FOR DETERMINING THE LIKELY SIGNIFICANCE OF EFFECTS ON THE ENVIRONMENT

1. The characteristics of plans and programmes, having regard, in particular, to—

(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;

(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;

(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;

(d) environmental problems relevant to the plan or programme; and

(e) the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).

2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to—

(a) the probability, duration, frequency and reversibility of the effects;

(b) the cumulative nature of the effects;

(c) the transboundary nature of the effects;

(d) the risks to human health or the environment (for example, due to accidents);

(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);

(f) the value and vulnerability of the area likely to be affected due to—

(i) special natural characteristics or cultural heritage;

(ii) exceeded environmental quality standards or limit values; or

(iii) intensive land-use; and
(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.