

# Local Plan Partial Review Issues and Options Consultation Schedule



THE ROYAL BOROUGH OF  
KENSINGTON  
AND CHELSEA

## Section 16: Impact assessments

### Integrated Impact Assessment (IIA)

**Question 1:** Are there any other Policies, Plans, Programmes, Strategies and Initiatives (PPPSIs) which should be considered for review?

Name	Comment	Council's Response
Environment Agency (Simon Banks)	EU Circular economy package <a href="http://ec.europa.eu/environment/circular-economy/index_en.htm">http://ec.europa.eu/environment/circular-economy/index_en.htm</a> Planning advice for new flatted properties <a href="http://www.lwarb.gov.uk/wp-content/uploads/2015/05/Final-report-Waste-Management-Planning-Advice-for-Flatted-Properties.pdf">http://www.lwarb.gov.uk/wp-content/uploads/2015/05/Final-report-Waste-Management-Planning-Advice-for-Flatted-Properties.pdf</a> New flood and coastal risk climate change allowance guidance is due to be released early this year. We will keep you informed when this has been released.	We have reviewed the additional documents suggested. The 'Flood risk assessments: climate change allowances' was published in February 2016. <a href="https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances">https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances</a>
Historic England (Katharine Fletcher)	In taking this approach we recommend that the IIA is broadened in several areas. Our comments are set out below.  Review of Policies, Plans and Programmes To ensure that the historic environment is integrated appropriately, to accord with the approach to sustainable development in para 8 of the NPPF, we recommend that the plans, policies and programmes relevant to the historic environment are included here. We suggest the Good Practice Advice in Planning Notes are listed in the nationally relevant publications: GPA1 'The Historic Environment in Local Plans', GPA2 'Managing Significance in Decision-taking in the Historic Environment' and GPA3 'The Setting of Heritage Assets'. Within the locally relevant publications we recommend that the conservation area appraisals should be included..	We have reviewed the additional documents suggested.

**Question 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.

Name	Comment	Council's Response
Historic England (Katharine Fletcher)	Baseline information Section 7 does not currently address the borough's historic environment. This needs to be clearly addressed within the report. This will then allow the potential impacts to be considered and the SEA/IIA process to assess how any harmful effects can be avoided in the first instance, or mitigated if this is not possible. The potential opportunities for enhancement of the borough's heritage should also be assessed through the review of options for each topic. Identifying heritage in the baseline information will ensure that there is clarity in terms of the environmental dimension of the assessment. This is particularly important for site allocations, the approach to 'Places' and the quantum of housing. Issues such as town centre boundaries (7.57) could also have heritage implications in light of the changes to policy 2.15 of the London Plan indicating that some centres may have potential for re-development. There are potential overlapping issues for other topics such as climate change adaptation, as indicated in our response to the Issues and Options report. It should be noted that, during the plan preparation process, the baseline information for the historic environment may change. We have suggested that a borough-wide characterisation report or overview would be helpful in developing a positive strategy. Within the forthcoming review of the Archaeological Priority Areas there will also be summary information provided about the significance of different areas. This could be incorporated into the SEA/IIA process.	We have added historic environment baseline into the IIA. We appreciate that baseline may change, and aim to regularly review key and relevant aspects of this.
Natural England	Consider potential inclusion of GI indicator for baseline data. Consider potential inclusion of GI (generally) as part of 'Open Space shortage' issue 'Environment' section. We welcome the intention of objectives 1, 5 and 8 specifically which can be interrelated. Potentially include specific and 'wider' objective relating to multi-functional GI.	We have added Green Infrastructure as a guiding question / sub-objective of IIA Objective 1.

**Question 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?

Name	Comment	Council's Response
Historic England (Katharine Fletcher)	Sustainability Issues The local plan partial review Issues and Options report identifies the value of the borough's exceptional built heritage and refers to reconciling new development with this high quality townscape. We consider that this issue should be identified within the Sustainability Issues in section 8.	Agreed – we have added this issue to the IIA.
Historic England	The potential opportunities for enhancement of the borough's heritage should also be assessed through the review of options for each topic	This will be done as a matter of course in conducting the IIA.
Historic England	Issues such as town centre boundaries (7.57) could also have heritage implications in light of the changes to policy 2.15 of the London Plan indicating that some centres may have potential for re-development. There are potential overlapping issues for other topics such as climate change adaptation, as indicated in our response to the Issues and Options report.	We will bear this potential in mind during the assessment stage. Climate change adaptation is considered separately in IIA Objective 5, but will also need to be considered on a topic-by-topic basis and thus specifically for the medium to long-term historic environment impacts.

**Question 4:** Do you have any comments on the IIA objectives or know of any further IIA objectives that should be considered?

Name	Comment	Council's Response
Environment Agency (Simon Banks)	Reduction in per capita waste generation could be added to encourage waste minimisation and help overall waste targets in terms of direction of travel and to make the overall set of objectives more 'circular' in approach, see also below. An additional indicator of tonnage of waste per capita could also be included	We have added a sub-objective to this effect.
Historic England	SA/IIA Objectives The NPPF places emphasis on conserving and, where possible, enhancing the significance of heritage assets. It also identifies the contribution of settings. While welcoming IIA objective 16, local distinctiveness, environmental quality and amenity do not necessarily address heritage interest. This objective could be amended to read: 'To conserve and enhance sites, features and areas of historical, archaeological, and cultural heritage	We have amended the IIA Objective on the historic environment. We have not added "including their settings" for the sake of brevity, but can assure Historic England that historic setting will be considered as inherent to the sites, features and areas.

**Question 5:** Do you have any comments on the assessment framework?

Name	Comment	Council's Response
Environment Agency (Simon Banks)	Reduction in per capita waste generation could be added to encourage waste minimisation and help overall waste targets in terms of direction of travel and to make the overall set of objectives more 'circular' in approach, see also below. An additional indicator of tonnage of waste per capita could also be included	We have added a sub-objective to this effect.

#### Habitat Regulations Assessment (HRA)

**Question 1:** Do you have any comments on the Habitats Regulations Assessment (HRA) Screening report?

Name	Comment	Council's Response
Environment Agency (Simon Banks)	Habitat Regulations Assessment (HRA) Screening report for the LPPR European (Natura 2000) sites which may be particularly relevant to the LPPR include: - Richmond Park SAC - Wimbledon Common SAC Natural England does not consider the policies being reviewed are likely to have a significant effect on the Natura 2000 sites identified above. Therefore, we confirm that the Council does not need to undertake Stage 2 of the HRA process. Integrated Impact Assessment (IIA) Scoping for LPPR In general terms Natural England is content with the proposed scope of the IIA. We do, however, offer the following comments with regard to the specific questions posed.	Agreed – Staged 2 of HRA is not required.

