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Your ref: LPPR



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## BY EMAIL ONLY

Dear Preeti et al

**Planning consultation:** Local Plan Partial Review (LPPR) Issues and Options Consultation, Habitat Regulations Assessment Screening and Integrated Impact Assessment Scoping  
**Location:** The Royal Borough of Kensington and Chelsea

Thank you for your consultation(s) on the above dated 15 December 2015.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England received two consultations with regard to The Royal Borough of Kensington and Chelsea Local Plan Partial Review (LPPR). The first, in relation to the Issues and Options consultation; and the second, with regard to the Habitat Regulations Assessment (HRA) Screening and Integrated Impact Assessment (IIA) Scoping for the LPPR. This letter provides for Natural England's response in respect of both of these consultations and will address each in turn.

### **WILDLIFE AND COUNTRYSIDE ACT 1981 (AS AMENDED) CONSERVATION OF HABITATS AND SPECIES REGULATIONS 2010 (AS AMENDED)**

#### **Local Plan Partial Review (LPPR) Issues and Options Consultation**

Natural England understands that the Council has commenced a Partial Review of the existing Consolidated Local Plan 2015. This includes the revision of a number of topics as well as a 'call for sites'. We note that this review does not propose alteration to existing Local Plan Policy CE4 (Biodiversity). Neither does the document contain any proposals which we believe would be harmful to nationally protected sites of ecological value.

Notably, Barn Elms Wetland Centre SSSI is located approximately 2km to the southwest of the plan boundary. Whilst it is unlikely there are any environmental pathways from the Plan area to the SSSI and therefore potential impact is unlikely, development options must ensure the interest features for which this national site has been notified are not damaged or destroyed.

We have had sight of the questions posed at the Options and Questions section of the document and provide comment as follows:

#### **Section 1. Introduction to the partial review**

Question 1 – Natural England notes that existing Local Plan Policy CE4 is not proposed for alteration. Whilst we have no particular objection to this we do wish to make the following comments



in support of the inclusion of a specific green infrastructure (GI) Local Plan Policy.

The provision of multi-functional green infrastructure (GI) offers benefits to the community, leisure, health and well-being. Multi-functional GI ensures open spaces are able to provide for both people and wildlife, able to provide a wide range of functions of benefit to the development and community. Such functions include improved flood risk management, provision of accessible green spaces, climate change adaptation, biodiversity and landscape enhancement (including better functionality of local ecological networks) as well as quality of life benefits for the local community (including health and economic well-being and access to wildlife).

The provision of GI is supported by the National Planning Policy Framework (NPPF, DCLG March 2012), London Plan Policy 2.18 and The Mayor's All London Green Grid (ALGG) SPG.

## **Section 14: Flooding and Drainage / 14.5 Issues and Options**

### **Issue 2: Surface water run-off and SuDS**

Question 1 – Natural England considers it important that the Council place a requirement upon developments to provide the most sustainable SuDS as well as the need to maximise green infrastructure and improve water quality .

### **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.

*Q1 – Are there any other Policies, Plans, Programmes, Strategies and Initiatives (PPPSIs) which should be considered for review?*

**No.**

*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.*

**Consider potential inclusion of GI indicator for baseline data.**

*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?*

**Consider potential inclusion of GI (generally) as part of 'Open Space shortage' issue 'Environment' section.**

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

**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.**

*Q5 - Do you have any comments on the assessment framework?*

**No.**

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Susan Murray on 0300 060 2967. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

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*Hours of work: Tuesdays and Thursdays only*