

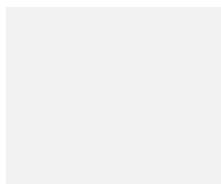
# LOCAL PLAN PARTIAL REVIEW – POLICIES

Integrated Impact Assessment Report – Submission Version

Non-Technical Summary

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## CONTACTS



**KATE BURROWS / HANNE  
LARSSON**  
Principal / Senior Environmental  
Consultants

Arcadis.  
401 Faraday Street,  
Birchwood Park,  
Warrington  
WA3 6GA

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## VERSION CONTROL

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03	27/01/2017	K Burrows	Updated with client comments ready for consultation
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## Abbreviations

Abbreviation	Full Term
AQMA	Air Quality Management Area
AONB	Area of Outstanding Natural Beauty
CO <sub>2</sub>	Carbon Dioxide
EA	Environment Agency
EqIA	Equalities Impact Assessment
GLA	Greater London Authority
IIA	Integrated Impact Assessment
LPPR	Local Plan Partial Review
LBHF	London Borough of Hammersmith and Fulham
NO <sub>x</sub>	Oxides of Nitrogen
NO <sub>2</sub>	Nitrogen Dioxide
NTS	Non-technical Summary
PPPSIs	Policies, Plans, Programmes, Strategies and Initiatives
PM <sub>10</sub>	Particulate Matter
RBKC	Royal Borough of Kensington and Chelsea
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SINCs	Sites of Importance for Nature Conservation
SOA	Super Output Area
SPDs	Spatial Planning Documents
UDP	Unitary Development Plan

## 1 Introduction

The Royal Borough of Kensington and Chelsea (also referred to herein as ‘the Council’) is undertaking a partial review of the borough’s existing Local Plan. The Local Plan Partial Review (LPPR) process began in earnest in 2015 with an eight-week consultation on Issues & Options that ran from 15 December 2015 to 9 February 2016. As a *partial* review, the LPPR covers certain policy areas, including housing targets, places, development site allocations, economy and retail, infrastructure and developer contributions, climate change, air quality, flooding, waste and arts and culture, among others.

The potential impacts of the LPPR Policies and policy options have been assessed in accordance with requirements of the European Union’s Strategic Environmental Assessment (SEA) Directive (2001/42/EU) and associated UK regulations as part of an Integrated Impact Assessment (IIA). The IIA process, its outcomes and recommendations were reported in a draft IIA Report issued for public consultation alongside the LPPR Policies in October 2016.

This document is the non-technical summary (NTS) of the IIA Report. It outlines the process that has been followed, beginning with initial scoping which set out the context, evidence base (or “baseline”) and proposed method for the assessment, and culminating in submission of the draft IIA report for consultation, as well as setting out key findings of the assessment.

This NTS was made available to the public alongside the IIA Report for consultation in February 2017 for the Publication version of the LPPR.

Following the close of the consultation the NTS and IIA Report were updated to reflect changes to the LPPR as a result of consultee and stakeholder comments received after the February 2017 consultation. Minor amendments to the report have been made as a result and to acknowledge the change in housing policies to account for the expected changes to the National Planning Policy Framework from the Government’s Housing White Paper ‘Fixing Our Broken Housing Market’. The changes to these have not resulted in any major assessment changes to the IIA Report and the findings remain sound.

## 2 Integrated Impact Assessment, SEA and SA

In accordance with UK planning law, each planning authority must prepare a development plan for their area. A ‘local plan’ is each planning authority’s key document for the future development of the area, setting out a vision and framework for housing, the local economy, community facilities and infrastructure. The Local Plan must be accompanied by a Sustainability Appraisal (SA), which appraises whether the policies and proposals in the plan are consistent with principles of sustainable development.

SA incorporates the requirements of the SEA Regulations and helps to ensure that potential environmental effects are given full consideration alongside health, social and economic issues. By testing planning policies against sustainability objectives, the IIA that accompanies the Council’s LPPR fulfils the requirements of SA and SEA, and reports the Local Plan’s likely significant effects, as well as opportunities for improving social, environmental and economic conditions in the borough. It also considers possible impacts on protected groups of people by incorporating an Equalities Impact Assessment (EqIA).

It is important that the IIA feeds into the plan-making process. This requires ongoing appraisal of the plan and recommendations to help avoid potentially adverse consequences and enhance opportunities. This is particularly important when considering alternative policy options. Consultation with statutory bodies (Natural England, Historic England and Environment Agency) and the public is also a requirement of the IIA/ SA process.

The IIA Report was developed alongside the Draft Policy Stage for the LPPR and now accompanies the Publication version of the LPPR and also considers the Submission Proposed Modifications.

### 3 The Royal Borough's Local Plan

The location of the Royal Borough of Kensington and Chelsea (RBKC) within Greater London is shown in Figure 1. Its neighbours are the City of Westminster to the east, London Borough of Brent to the north, London Borough of Hammersmith and Fulham to the west, and across the River Thames to the south lies the London Borough of Wandsworth (directly linked by three road bridges and the London Underground).



Figure 1 Map showing the Royal Borough of Kensington and Chelsea

The Royal Borough's Local Plan sets out a vision and framework for future development in the area. It covers the period up to 2028 and is one of four types of document making up the Council's development plan, the other three being the Unitary Development Plan (UDP), the Mayor of London's 'London Plan', and the following neighbourhood plans:

- Norland Neighbourhood Plan (adopted March 2014), and
- St. Quintin and Woodland Neighbourhood Plan (passed referendum 2016, to be adopted in due course).

### 4 Scope of the Integrated Impact Assessment

The study area used for the IIA of the Local Plan Partial Review is Greater London, with a particular focus on the Royal Borough area and its neighbouring authorities. Some effects covered by IIA topics, including climate change and air quality, are to do with regional and national issues, and are therefore likely to extend beyond the boundary of the study area. In these instances, the IIA focuses on local indicators that can be used to represent wider impacts.

The IIA covers the plan period (to 2028), and a period of approximately 10 years beyond to consider the long-term implications of planning policy decisions. This helps to identify whether the effects are likely to be permanent or temporary.

Information on the environmental, social and economic characteristics of the borough was collected in order to understand the baseline, and to enable key issues, opportunities and trends to be identified. A review of

other relevant environmental protection objectives and policies was also undertaken focusing on identifying key environmental and sustainability objectives that would need to be considered during the IIA and LPPR.

A Scoping Report setting out the baseline information, scope of the assessment and methodology to be applied was published for public consultation in December 2015. Statutory consultees such as Natural England, Historic England and the Environment Agency, and the public were invited to comment on the contents of the Scoping Report to help shape development of the IIA.

## 5 Key Sustainability Issues

To enable a robust assessment of the LPPR Policies, information was collected to understand the existing conditions and characteristics of the borough. This includes aspects such as population dynamics, levels of deprivation, health, environmental resources, employment patterns and the condition of housing stock and its affordability.

The Council produces an Authority Monitoring Report that includes the most up-to-date information available on broad themes such as demography and the economy. The latest Monitoring Report available at the time (2015) was the source of most of the baseline information collected as part of the scoping stage. Where other sources were used these were stated in the Scoping Report. This baseline information was then used as the basis for identifying key sustainability issues in the borough.

Table 1 presents the key issues that were identified during the review of baseline information.

Table 1 Key Sustainability Issues

Sustainability Issue	Supporting evidence
<b>Economic</b>	
High levels of relative deprivation	Some of the borough's wards are among the most economically deprived in the country, particularly north of the Westway and SW Chelsea.
Geographic disparities in deprivation	Indices of Multiple Deprivation data for 2015 shows that there remains a clear north-south divide in the borough in terms of deprivation.
Inequalities in income	Clear inequalities between the north and south of the borough in terms of income deprivation with many Super Output Areas (SOA) being in the bottom 10% of those in the UK.
More hotel development is needed to support the key sector of tourism	The GLA's hotel study of 2013 suggests that the borough potentially needs 2,700 additional rooms by 2036 to meet increasing demand.
Demand for greater retail provision, and competition from neighbouring areas	In the next five years, the need for new comparison floorspace is negligible, but this does rise to a need for 21,000 sq. m 2016- 2028.
Pressure on office space	There is an ongoing shortage of office units across the borough, including small office units (<300 m <sup>2</sup> and particularly <100 m <sup>2</sup> ).
Need for affordable housing	Rising house prices are forcing workers such as hospital staff and teachers to commute longer distances into the borough, and the cost of this

Sustainability Issue	Supporting evidence
	commute is increasing, which prices some individuals out of working in the borough.
Differential in value between office and residential use	Increasing pressure is being placed upon the borough's office space stock due to the differential in value between office and residential uses.
<b>Environment</b>	
Air quality which exceeds national air quality objectives	<p>The entire borough is a declared AQMA for both PM<sub>10</sub> and NO<sub>2</sub>.</p> <p>London Atmospheric Emission Inventory estimates for 2012 showed that 906 tonnes of NO<sub>x</sub> and 76 tonnes of PM<sub>10</sub> are emitted annually within the borough, primarily from road transport sources.</p>
Shortage of open space	<p>There is a shortage of open space in the borough and a shortage of areas in which to create additional open space.</p> <p>The borough has the second lowest proportion of open space to total land area, and the lowest amount of open space per person in London and the UK.</p>
RBKC not meeting waste recycling targets with a high proportion of waste going to landfill	<p>The cost of waste collection per household in the borough is increasing and higher than the average across London.</p> <p>The percentages for household waste recycled, composted and recovered in the form of electricity generation are all below UK and London averages.</p> <p>Adequate waste and recycling storage is needed in new builds, housing conversions and office developments.</p>
Potential sewer flooding	This is caused by the lack of capacity of the Counters Creek combined sewer system. Urban creep exacerbates the problem by increasing the amount of surface water run-off discharged into the sewer.
Reconciling new development with the borough's heritage and high-quality townscape	The borough is rich in historic environment assets, as indicated by the large proportion of the borough designated as a Conservation Area. A great amount of original heritage survives in these areas, providing the borough with a sensitive and high-quality townscape in many areas.
<b>Health</b>	
Limited access to services and facilities and ageing population	<p>There is an existing shortage of Doctors Surgeries and GPs in the borough, which could worsen due to changing demographics.</p> <p>GLA Household Projections suggest the proportion of households with people aged 65 and over will increase</p>

Sustainability Issue	Supporting evidence
	<p>from 14% in 2012 to 23% in 2037, a rise from 10,900 to 20,000 in absolute terms.</p> <p>There is limited availability of care homes for the elderly.</p>
<p>Increased crime rates for sexual offences and burglary</p> <p>High levels of fear of crime</p> <p>Increase in drug-related offences</p>	<p>While total notifiable offences rates are declining, there have been increases in sexual offences and burglary.</p> <p>Fear of crime is higher than England and Wales averages.</p> <p>Drug offences are on the increase.</p>
<b>Equalities</b>	
<p>High Average house prices</p>	<p>RBKC has consistently had the highest median house prices in both London and England. The median sale price in 2014 was £1,198,500. Prices in RBKC, Westminster, and the City of London are not only in a league of their own but they have also shown by far the steepest rates of increase since 2008 (72% in RBKC for example).</p>
<p>Accommodation needs of Gypsy and Traveller communities not being met</p>	<p>The Gypsy and Traveller Accommodation Needs Assessment identifies need for an additional 10 pitches over the next 10 years in the RBKC and LBHF combined area.</p>

## 6 IIA Framework

Table 2 contains the IIA Objectives which form the basis of the assessment stage framework. It is against these objectives that policies and proposals in the LPPR have been assessed. Each IIA Objective is supported by a set of ‘decision-guiding questions’ which help to establish the scope / ‘boundaries’ of that objective, and the main issues which it seeks to address.

Table 2 IIA Framework

IIA Topic Heading	IIA objective / decision-guiding questions, as: “Will the policy or proposal...”	Reason for Sub-Objective
<b>Biodiversity, flora and fauna</b>	<b>1. To conserve and enhance biodiversity</b>	
	... lead to a decrease or increase of greenfield land, from common habitat to habitats within designated nature conservation sites?	Some of the borough’s greenfield land is designated for nature conservation, but even that which is not could be valuable as a biodiversity resource, and both could be affected by new development.
	... lead to effects on habitat connectivity and/or protected or priority species?	Development (including on brownfield land) has the potential to affect habitats for protected and priority species. Loss of greenfield land or change in land use can affect the mobility of certain animal species or spread of vegetation (etc.).
	... contribute to Green Corridors and/or a net increase in Green Infrastructure?	Consultation comment from Natural England, and the review of PPPSIs reveals this as a key common theme, cross-cutting recreation and biodiversity objectives.
<b>Crime</b>	<b>2. To reduce crime and anti-social behaviour and the fear of crime</b>	
	... lead to a change in vulnerability to crime, including anti-social behaviour?	Development is mainly relevant to crime via issues around dereliction, compatibility of land use / permitted business use, quality of the public realm, levels of natural surveillance and active site usage.
<b>Economy and skills</b>	<b>3. To support a diverse and vibrant local economy to foster sustainable economic growth</b>	
	... improve opportunities for business growth, especially office and retail space?	The baseline identifies office floorspace as a particular issue of concern for the borough, and there is a need to carefully monitor and manage retail need.
	... provide or generate economic activity and new jobs, especially for people living in more deprived areas?	This is the main thrust of the headline objective.
<b>Equalities</b>	<b>4. To encourage social inclusion (<i>including access</i>), equity, the promotion of equality and a respect for diversity</b>	
	... help to improve the proportion of housing which is suitable for all people, including those with disabilities, throughout their lifetimes?	The EqIA baseline and workshop revealed that these are key problems for the borough. The IIA will assess how well the

IIA Topic Heading	IIA objective / decision-guiding questions, as: "Will the policy or proposal..."	Reason for Sub-Objective
	... help to improve the accessibility of transport, services and facilities to all people?	plan can achieve equitable housing, transport and access, as well as contribute to the work done by key workers and volunteers or other organisations to support vulnerable people.
	... contribute to the conditions needed for organisations and key workers in the borough, helping vulnerable residents?	
	... with reference to SA Objective 13, help to improve access to affordable, quality homes for all?	
<b>Climate change</b>	<b>5. To minimise effects on climate change through reduction in emissions, and adopt measures to adapt to climate change</b>	
	... help the borough to reduce its emissions from transport?	Transport accounts for 12% of the borough's CO <sub>2</sub> emissions.
	... help the borough to reduce its emissions from housing and other development?	Energy consumption from housing accounts for 29% of the borough's CO <sub>2</sub> emissions, and from industry and commercial buildings it's 57%.
<b>Flood risk</b>	<b>6. To reduce the risk of flooding to current and future residents</b>	
	... avoid placing new development or people's activities in locations at risk of flooding?	These are the two ways in which the LPPR can potentially influence levels of flood risk in the borough.
	... improve or alleviate existing flood risk?	
<b>Air quality</b>	<b>7. To improve air quality in the Royal Borough</b>	
	... reduce emissions from construction and operation of buildings?	A significant proportion of emissions are from construction sites and non-road mobile machinery.
	... reduce emissions from transport?	Transport accounts for as much as 49% of the borough's air pollution.
<b>Parks and open spaces</b>	<b>8. To protect and enhance the Royal Borough's parks and open spaces</b>	
	... ensure new residents have good access to high-quality parks and open spaces, including children's play areas?	These are the two ways in which the LPPR can potentially influence parks and open spaces in the borough.
	... improve access to or the quantity / provision of parks and open spaces?	
<b>Water and Land</b>	<b>9. To protect and enhance water and land resources, including quality</b>	
	... protect and improve water quality?	There are few open water bodies in the borough, but those such as the Grand Union Canal and River Thames require protection, and ideally improvement.
	... relieve pressure on greenfield land, and recover and use soils sustainably?	The borough has some remaining brownfield land and few greenfield land resources upon which it could build,

IIA Topic Heading	IIA objective / decision-guiding questions, as: "Will the policy or proposal..."	Reason for Sub-Objective
		making previously developed land a preference both from a regeneration perspective, and preservation of remaining green space.
<b>Transport</b>	<b>10. To promote traffic reduction and encourage more sustainable alternative forms of transport</b>	
	... ensure new residents have good access to a range of sustainable transport options?	These are the ways in which the LPPR can potentially influence usage of alternative forms of transport in the borough.
	... provide additional sustainable transport facilities or capacity for use by existing residents?	
... locate high trip-generators within town centres and other areas well served by public transport?		
<b>Waste</b>	<b>11. To reduce the amount of waste produced and minimise the amount sent to landfill</b>	
	... where possible, reduce the generation of waste (per capita)?	Based on a scoping consultation comment from the EA, and also to ensure such opportunities are seized, where possible.
	... ensure new developments maximise opportunities to avoid landfill?  ... provide new facilities for the better management of existing sources of waste in the borough?	These are the two ways in which the LPPR can potentially influence sustainable waste management in the borough.
<b>Access to services and facilities</b>	<b>12. To ensure that social and community services and facilities which serve a local need are enhanced, protected, and to encourage the provision of new community facilities</b>	
	... ensure new developments have sufficient services and facilities accessible by foot and cycle?	These are the three key ways in which the LPPR can potentially influence the relative accessibility of services and facilities in the borough.
	... provide new services or facilities accessible to all residents?	
... improve residents' access to public transport?		
<b>Housing</b>	<b>13. To meet the housing needs of the Royal Borough's residents</b>	
	... improve the affordability of housing?	Affordability is a very key issue in the borough.
	... lead to a higher quality of housing in the borough which meets the needs of residents over their entire lifetimes?	Quality of housing stock can include a number of issues affecting the borough, from indoor air quality and energy efficiency, to meeting standards which make accommodation adaptable for people over their lifetime.
... target areas most in need of new housing and greater affordability?	The economic disparity across the borough is a very key issue.	

IIA Topic Heading	IIA objective / decision-guiding questions, as: “Will the policy or proposal...”	Reason for Sub-Objective
<b>Materials</b>	<b>14. To maximise the re-use of buildings and the recycling of building materials</b>	
	... promote the reuse of buildings?	These are the two ways in which the LPPR can potentially influence sustainable use of materials in the borough.
	... lead to a reduction in the proportion of building materials/waste going to landfill?	
<b>Health and well-being</b>	<b>15. To improve health and wellbeing for all borough residents</b>	
	... improve access for new and existing residents to healthcare?	Identified as a key issue by review of the baseline.
	... reduce the disparity in health and well-being across the borough, by providing health-related enhancements (particularly active recreation and transport) in the most deprived areas?	Identified as a key issue by review of the baseline.
	... improve the overall living environment, such as housing quality, noise, air quality, and attractiveness to walking and outdoor recreation for residents?	This is a key cross-cutting health and well-being issue, addressing wider environmental factors.
... help to encourage healthy behaviours?	Besides physical activity, risk behaviours are an issue for the most deprived communities. Access to opportunities for good health, and good information is important.	
<b>Cultural heritage and townscape</b>	<b>16. To conserve and enhance sites, features and areas of historical, archaeological, and cultural heritage value, local distinctiveness and townscape quality</b>	
	... lead to development which preserves historic environment assets, including their setting?	The borough is rich in cultural heritage and historic environment assets.
	... contribute to the long-term preservation and enhancement of the borough’s heritage?	Conservation can often require restoration in the first instance. There may be less direct opportunities to remove negative influences on the borough’s historic assets, and create net improvement.
	... improve townscape quality, providing development which is sympathetic in design to its neighbours, where appropriate, and enhances the image of the area?	Townscape quality can be preserved and improved with suitably informed design approaches and techniques.
<b>Energy and Energy-Efficiency</b>	<b>17. To reduce the use of energy, minimise reliance on fossil fuels, and encourage energy efficiency.</b>	
	... lead to a per capita reduction in energy usage?	These are the two ways in which the LPPR can potentially influence sustainable energy use in the borough.
	... lead to a reduction in reliance on fossil fuels?	

## 7 Assessment of the Local Plan Partial Review

### 7.1 Assessment of Local Plan objectives

In line with SA/ SEA requirements, the first stage of the assessment involved a comparison of the Local Plan’s objectives with the IIA objectives to identify where they support each other or conflict. The goal was not to eliminate conflicts, but to inform development of the LPPR and secondarily to refine the Local Plan’s objectives where necessary.

The Local Plan has the following strategic objectives:

- CO1: To keep life local;
- CO2: To foster vitality;
- CO3: To offer better travel choices;
- CO4: To maintain and extend our engaging public realm;
- CO5: To renew our legacy;
- CO6: To achieve a diversity of housing; and
- CO7: To respect environmental limits.

Table 3 below provides a summary of the compatibility appraisal of the Local Plan Objectives.

Table 3 Compatibility appraisal of the Local Plan Objectives

	IIA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
CO1	-	+	+	+	-	-/+	+	0/-	0/-	+	-	+	0	-	+	-/+	-/+
CO2	-	0/+	+	-/+	-/+	-/+	-	-	-	-/+	-	+	0	-	+	-	-/+
CO3	-/+	+	+	+	+	0	+	0	-	+	-	+	0	-	+	+	0
CO4	-/+	+	+	+	+	0	+	+	0	+	-	+	0	-	+	+	0
CO5	-/+	+	+	+	+	0	+	+	0/+	+	-/+	+	+	-/+	+	+	-/+
CO6	-	-/+	+	+	-	-/+	-	-	-	-	-	-	+	-	+	-	+
CO7	+	0	0	+	+	+	+	0	+	+	+	0	0	+	+	0	+

### 7.2 Alternatives for Local Plan Objectives

Government guidance on SA/SEA advises that only realistic and relevant alternatives should be considered and they should be sufficiently distinct to enable a meaningful comparison of their different environmental effects.

Three reasonable alternatives were considered:

- Maintain existing objectives and supporting text;
- Maintain existing objectives but amend the supporting text for the “Diversity of Housing” strategic objective to explicitly reference increasing the quantum of housing; and
- Maintain existing objectives but amend the supporting text to reference cultural institutions, transparency and accountability, air quality, historic environment and river-based transport.

In sustainability terms, the IIA found there to be no significant difference among the three options, as an increase in housing is assumed regardless, and Option 3 is already covered under the various objectives, even where not specifically referenced. Options 2 and 3 are preferred.

### **7.3 Assessment of Estate Regeneration Options and Proposed Sites / Allocations**

The IIA has considered four policy options for Estate Regeneration, which have informed the identification of development site allocations. These options are:

- Maintain 'business as usual', and only pursue small-scale improvements;
- Refurbish existing estates;
- Infill development on available land in estates; and
- Comprehensive redevelopment of housing estate allocations.

Overall, Option 1 is neutral and Option 2 presents opportunity for some minor benefits via refurbishment work to existing properties. Option 3 risks a number of adverse sustainability effects in order to deliver new housing and some beneficial effects associated with housing affordability and quality. Option 4 presents the opportunity for a range of benefits, including some major benefits, with fewer or lessened risks of adverse effects across certain environmental and community issues. While Option 4 may contribute most to sustainability, the Council is aware that there is a need for good communication with, and consideration of the needs of, existing residents, as well as consideration of the need for high-quality design.

The LPPR includes 12 proposed development site allocations. Thirteen sites were considered, and as the Royal Borough has very little available land, all reasonable options are being allocated with the exception of South Kensington Station, which has a number of complex constraints, including the site being narrow, immediately adjacent to the tube line and within the setting of a listed building. These constraints have implications for design and residential amenity.

#### **7.3.1 Northern Borough: North Kensington and Ladbrooke Grove**

Allocated sites are:

- Kensal Canalside Opportunity Area;
- Wornington Green;
- Land adjacent to Trellick Tower;
- Barlby-Trevelton; and
- Silchester Estates.

These sites offer substantive socio-economic and regeneration benefits, as exemplified by meeting many positive criteria against IIA Objectives for crime (2), the economy (3), equalities (4), parks and open spaces (8), transport (10), access to services and facilities (12) and housing (13).

Brownfield land development presents an opportunity to promote remediation and minimise pressure on greenfield land (9), which is a significant beneficial effect to land resources.

There is a need to recognise and respect green corridors along the railways in this area, even though segments have recently been de-designated from Site of Nature Conservation Importance (SNCI) status, and some of the existing vegetation may be scarce. These corridors typically represent the best corridors in the city due to London's urban nature. With targeted habitat creation and management alongside development (some already planned or committed via development planning), there is potential for net biodiversity benefits.

There is some potential for adverse effects on the historic environment (16), given features within or in close proximity to the sites. Cultural heritage assessments should be conducted which consider conservation of heritage on-site and the historic setting of nearby features. The development design should seek to enhance these settings and not detract from them. With appropriate mitigation, there is also some potential for net

benefits to townscape and the historic environment, by replacing unsympathetic land uses with a new, well-designed and well laid out built environment.

Surface water flood risk (6) is also an issue for most of these sites, and comprehensive drainage and flood risk assessments should be required. As with all development, the sites will result in the generation of waste, a proportion of which will end up in landfill (11), and the use of raw materials during construction and the on-going operation and maintenance of new development (14).

Air quality is a pervasive borough-wide, and indeed London-wide, issue, which is being tackled via both Greater London and local policy, projects and initiatives. The Council is already seeking to secure low levels of car parking at all the current and potential sites, but could create a zero parking (other than for essential needs) requirement, with the exception perhaps of electric vehicles.

Excellent accessibility potential, proposals for improving sustainable transport at these sites, and local sources of recreation and active travel should lead to benefits to climate change (5) and health and well-being (15). The new developments propose high standards of energy efficiency and sustainable design, including combined cooling, heating and power (CCHP) (17).

### **7.3.2 Central Borough: Notting Hill, Kensington, Holland Park, Earl's Court and South Kensington**

Allocated sites are:

- Earl's Court Exhibition Centre;
- Warwick Road Sites;
- Warwick Road Estate; and
- Harrington Road.

As for the northern borough, these sites offer substantive socio-economic benefits, plus regeneration benefits at Earl's Court Exhibition Centre and Warwick Road, as exemplified by meeting many positive criteria against IIA Objectives for the economy (3), equalities (4), parks and open spaces (8), transport (10), access to services and facilities (12) and housing (13).

The assessment is very similar to that for the northern borough sites. A key likeness is the key green corridor along the railway to the west of Warwick Road and Earl's Court Exhibition Centre, which could benefit from enhancement. The key differences are, with the exception of Earl's Court Exhibition Centre, a presumed negligible effect on crime levels (as the sites are in an area of low crime anyway) and the fact that the Pembroke Road and Harrington Road sites lack most of the environmental sensitivities given they are urban sites in active use at present. The IIA recommends that as the sites are in the most expensive part of the borough (average house prices in surrounding areas being double the cheaper areas of the borough), a high amount of affordable homes should be provided.

### **7.3.3 Southern Borough: Chelsea and Knightsbridge**

Allocated sites are:

- Lots Road;
- Site at Lots Road; and
- Chelsea Farmer's Market.

These sites again meet the criteria for offering substantive socio-economic benefits as exemplified by meeting many positive criteria against IIA Objectives for the economy (3), equalities (4), transport (10), access to services and facilities (12) and housing (13).

Similar to three of the centre borough sites, these sites lack most of the environmental sensitivities given they are urban sites in active use at present. There are biodiversity, flood risk and cultural heritage constraints to address, but these are viewed as feasible to fully mitigate at this stage. Notably, the Lots Road site shares an adjacent green corridor with the Earl's Court Exhibition Centre and Warwick Road sites to the north, and this should be taken into account in development design. Lots Road and Lots Road Power Station are adjacent to mudflat along the Thames, and must consider flood risk and cultural heritage issues.

### 7.3.4 Alternative Sites Considered

Non-allocated sites are:

- South Kensington Station.

This site generally meets the description above for 'central borough'. As a biodiversity risk, the site is adjacent to woodland and near to an SNCI, but these constraints are easily mitigated. The site offers benefits to the economy (3), equalities (4), climate change (5), parks and open spaces (8), land (9), transport (10), access to services and facilities (12), housing (13) and health and well-being (15).

However, the site is within a Conservation Area and contains a Grade II Listed Building, in addition to being in proximity to other Grade II Listed Buildings and a Grade II\* Listed Building. Although it is considered that there is potential to avoid significant adverse effects on the historic environment and townscape, it is felt that the high sensitivity of the site requires more careful consideration, and therefore is not appropriate to allocate at this stage.

## 7.4 Assessment of Policies and Alternatives

The Council began the LPPR process in 2015 by developing and consulting upon an Issues & Options document. This allowed the Council to develop its thoughts on the range of policy options available for updating the Local Plan, and then to consult upon the options considered in order to receive suggestions from key stakeholders and the public. In total, the LPPR includes the update of 23 policies.

Each of the below sub-sections by IIA Topic summarises the effects expected of all policies combined across the borough.

### 7.4.1 Biodiversity

Despite mitigation, there is the potential for short-term minor adverse effects to biodiversity as a result of development resulting from the LPPR, as sites are cleared of vegetation to make way for new houses, office space, retail, community uses, transport infrastructure and other forms of development. In the long term, the effects are expected to be a net benefit to biodiversity in the borough, mainly in the central borough area as a result of habitat creation at Earl's Court and Warwick Road.

The only alternative policy option which could improve the LPPR's performance against the biodiversity objective is to maintain a lower quantum of development, rather than increasing to the London Plan's revised housing target. However, this is not a 'reasonable alternative' as the plan would be found unsound.

### 7.4.2 Crime

The Kensal Gasworks, Wornington Green and Trellick Tower sites at the northern end of the borough are within an area within the top 10-20% most deprived for crime nationally, and Warwick Road within the 40% most deprived from crime. Regeneration in these areas could have a major beneficial effect in the medium term. In the long term, the benefit will not be as strongly perceived and other socio-economic factors may begin to dominate, with the effects of the LPPR indicated as being minor beneficial.

None of the alternative policy options are likely to improve the LPPR's performance against the crime objective.

### 7.4.3 Economy and Skills

The effect of Local Plan policies to economic growth are expected to include major regeneration benefits in North Kensington and at Warwick Road / Earl's Court. The provision of new office and retail floorspace would, in the long-term, improve opportunities for business growth and in turn would also provide job opportunities for people living within the borough. New housing can generate economic opportunity through design and construction, and the ongoing maintenance and running of residential development, and can also create the affordable housing needed to house key workers for the borough, and thus sustain the local economy.

None of the alternative policy options are likely to improve the LPPR's performance against the economic objective.

#### **7.4.4 Equalities**

With site-specific plans and further planning guidance, it is felt that the effect of the LPPR will be major beneficial overall in the borough, and also in the north and centre of the borough where most of the development is taking place. Further development in the south of the borough will help to deliver minor beneficial equalities effects there. It is considered likely that areas beyond the borough's boundaries also benefit from the additional and more affordable and accessible housing, as residents in Greater London often move from borough to borough.

The assessment concludes that several alternative policy options would improve the LPPR's performance against the IIA Objective for equality. These include seeking provision of affordable shops in new largescale retail developments, policies which provide for a presumption against amalgamations of residential properties, use of the SHMA (Strategic Housing Market Assessment) affordable housing tenure split, and extending the Stable Way Gypsy and Traveller site. The reason for not selecting these options is outlined in the main IIA Report – Appendix F.

#### **7.4.5 Climate Change**

There is potential for short and medium-term minor adverse effects to carbon emissions as a result of development. There is currently no feasible way to foresee at this stage an entire "zero emissions" solution to all of the new development cumulatively within this timeframe, despite the efforts of policy and other measures. Beyond the borough, cumulative new development is expected to lead to increased transport in Greater London, and thus greater carbon emissions, whether on road, rail or other forms of transport. The assessment considers the net effect of all of the new development to be neutral in the long term – i.e. a fully mitigated carbon impact. However, the uncertainty of this assessment is "high", given the many uncertainties in calculating the total carbon footprint of development.

The assessment concludes that several alternative policy options would improve the LPPR's performance against the IIA Objective for climate change. These include using a 'town centre first' approach to hotels, and policies which provide for a presumption against amalgamations of residential properties. The reason for not selecting these options is outlined in the main IIA Report – Appendix F.

#### **7.4.6 Flood Risk**

It is considered likely that the LPPR, all policies considered may offer some benefits to flood risk. However, at this high strategic level, effects are anticipated to be negligible.

None of the alternative policy options are likely to improve the LPPR's performance against the flood risk objective.

#### **7.4.7 Air Quality**

While considering all mitigating policy in place, there remains potential for both short and long-term minor adverse effects to air quality as a result of development. There is currently no feasible way to foresee at this stage an entire "zero air pollution" solution to all of the new development cumulatively, despite the efforts of policy and other measures. However, the uncertainty of this assessment is "high", given the many efforts from different angles being made to improve the future baseline for air quality, and to improve it throughout Greater London. The effect of the LPPR and Local Plan is likely to remain negative, but it could eventually be "negligible negative" (given a low increase with all of the mitigation) if the long-term future baseline were to be one where all relevant Air Quality Management Areas (AQMAs) both within the borough and beyond, are de-designated.

The only alternative policy option which could improve the LPPR's performance against the air quality objective is to maintain a lower quantum of development, rather than increasing to the London Plan's revised housing target. However, this is not a 'reasonable alternative' as the plan would be found unsound.

#### **7.4.8 Parks and Open Spaces**

The combined effects of policies are likely to be mainly minor beneficial from the short to long term, both within the borough, and to neighbouring boroughs (particularly Hammersmith and Fulham near to Earl's

Court / Warwick Road, and Brent and Westminster near to Kensal Gasworks). A major beneficial effect is expected in the Earl's Court area.

The only alternative policy options which could improve the LPPR's performance against the parks and open spaces objective is to maintain a lower quantum of development, rather than increasing to the London Plan's revised housing target, and resisting losses through amalgamations and reconversions. However, maintaining a lower quantum of development is not a 'reasonable alternative' as the plan would be found unsound.

#### **7.4.9 Water and Land**

With all LPPR policy considered, its effects are likely to be mainly minor beneficial in the short term, both within the borough, and to neighbouring boroughs (particularly Hammersmith and Fulham near to Earl's Court / Warwick Road, and Brent and Westminster near to Kensal Gasworks). A major beneficial effect is expected in the long term given the site remediation at Kensal Gasworks and Warwick Road / Earl's Court.

None of the alternative policy options are likely to improve the LPPR's performance against the water and land objective.

#### **7.4.10 Transport and Access to Services and Facilities**

By ensuring that adequate contributions are made to public transport, community services and facilities, the net effect of the LPPR and Local Plan is considered major beneficial in the short, medium and long term relative to both access to sustainable transport and access to services and facilities. The site assessment showed that all the sites are in highly accessible locations, with a diverse range of essential services within walking distance. It is considered likely that areas beyond the borough's boundaries also benefit from the improvements to sustainable transport opportunities, and to community services and facilities.

None of the alternative policy options are likely to improve the LPPR's performance against the transport or access to services and facilities objectives.

#### **7.4.11 Waste**

Major developments including business use and housing would lead to the generation of both construction and operational waste. With or without mitigation for waste minimisation and management, this would lead to a significant increase in waste to be managed, and most likely some waste will require disposal at landfill. It is recognised that the London Plan is working towards managing the equivalent of 100% of London's waste within London by 2026, though it is difficult to foresee at this stage a specific year for zero end disposal, and a proportion near to 100% reuse, recycling and recovery.

The assessment concludes that two alternative policy options would improve the LPPR's performance against the IIA Objective for waste. These include seeking a lower quantum of development, and policies which provide for a presumption against amalgamations of residential properties. However, maintaining a lower quantum of development is not a 'reasonable alternative' as the plan would be found unsound.

#### **7.4.12 Housing**

With further targeted application in the form of the site-specific plans and further planning guidance, it is felt that the effect of the LPPR will be major beneficial throughout the borough. It is considered likely that areas beyond the borough's boundaries also benefit from the additional more affordable and better-quality housing, as residents in Greater London often move from borough to borough.

For the assessment of policy alternatives for housing no alternatives performed better than the preferred options.

#### **7.4.13 Materials**

New development including business uses, housing and associated infrastructure will ultimately lead to increased use of raw materials during both construction and operational stages. With mitigating policy, the effect is considered minor adverse in the short, medium and long term.

The assessment of policy alternatives for materials is the same as for the IIA topic 'Waste'.

#### 7.4.14 Health and Well-being

The health and well-being assessment is in essence a 'cumulative effects' assessment of the other effects of the Local Plan on different IIA Topics acting together to affect people's health and well-being. The potential adverse consequences of the LPPR and Local Plan on health and well-being without mitigating policy have been discussed at length in each of the above IIA Topic sections. The effects of the LPPR and Local Plan are considered major beneficial to access to healthcare, particularly in the northern borough and central borough, where major regeneration projects propose to create new health facilities. A range of measures presents an opportunity to reduce the disparity in health and well-being between the north and west of the borough, and the south and southeast. It is likely that the net effect upon overall living environment will be major beneficial when considering the number of vulnerable people potentially assisted by new, better-standard homes, and an improved outdoors living environment. Such benefits should be experienced from short to long term. It is arguable that the predominant health effect to do with 'healthy behaviours' could be economic – if housing is made more affordable, and employment and income opportunity are generated in the borough, this should improve people's average wealth. The effect has been assessed as major beneficial from the short to long term.

For the assessment of policy alternatives for health and wellbeing housing no alternatives performed better than the preferred options.

#### 7.4.15 Cultural Heritage and Townscape

It is envisaged that for all proposed development, historic assets can be preserved and any effects made negligible, and that redevelopment presents opportunities to lead to net benefits to townscape and historic setting. The effects of the LPPR are considered beneficial from the short to long term.

The only alternative policy option which could improve the LPPR's performance against the cultural heritage and townscape objective is to maintain a lower quantum of development, rather than increasing to the London Plan's revised housing target. However, this is not a 'reasonable alternative' as the plan would be found unsound.

#### 7.4.16 Energy and Energy Efficiency

With the robust and far-reaching mitigating policy of the London Plan and policies of the LPPR and Local Plan in place, it is expected that in the short to medium term, a vast amount of new construction will use a large amount of fossil fuels, even with mitigation. This is considered a minor adverse effect across the borough. However, it is expected that new development designed to high standards of energy efficiency and drawing on renewable energy, will ensure that the energy efficiency of the Royal Borough, and its reliance on fossil fuels into the long term will decline. This should amount to a net beneficial effect in the long term, and is minor beneficial in significance without more concrete data on energy use forecasts.

## 8 Cumulative Effects

The IIA inherently accounts for cumulative effects caused by:

- Different development proposals, including those in other plans and strategies, both within and near to the Royal Borough;
- Multiple effects which combine to affect one receptor within the bounds of an IIA Topic (e.g. air quality and water effects on biodiversity, or economic, air quality and open space effects on human health); and
- The mitigating effects of different plans and strategies acting together.

Most development in the borough is concentrated in the north and southwest. As a result, this is where the LPPR will generate the most socio-economic benefit, as well as being the area where risks of adverse environmental consequences are highest if mitigation is not fully effective. These potential adverse impacts include:

- Air quality impacts;
- Short-term losses of habitat / effects on biodiversity; and

- Other localised impacts such as construction traffic affecting congestion and road travel journey times, although these effects should be minimised.

Cumulative benefits across the borough will include an improved network of community services and facilities, including parks and open spaces. Although this infrastructure will be targeted at local communities, to avoid capacity issues on existing infrastructure and to address pre-existing deficits, it will be accessible to the public and thus benefit all communities.

## 9 Monitoring

The Council's existing Authority Monitoring Reports already include a robust range of environmental and socio-economic indicators and are prepared in line with EU Directive 2001/42/EC (Article 10(1)), Regulation 17 of The Environmental Assessment of Plans and Programmes 2004 and Appendix 10, A Practical Guide to SEA Directive (ODPM). It is proposed to continue the use of these Reports in order to provide continuity to the Council's monitoring for the Publication Version of the LPPR.

## 10 Next Steps

This non-technical summary of the Policies IIA Report will be issued for submission and examination to accompany the next stages of the LPPR (Reg 22-25).