

Royal Borough of Kensington & Chelsea Local Plan Partial Review

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MATTERS, ISSUES AND QUESTIONS (MIQs)

Introduction

The purpose of this independent examination of the Royal Borough of Kensington and Chelsea Local Plan Partial Review (RBKCLPPR) is to determine whether the plan:

- has been prepared in accordance with the Duty to Co-operate and the legal and procedural requirements in the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Plan) (England) Regulations 2012; and
- is sound, as defined in paragraph 182 of the NPPF.

It is important to note that this is a Partial Review of the Kensington and Chelsea Local Plan. It does not address every policy or proposal in the current development plan. Rather it seeks to supersede all remaining saved policies in the borough's Unitary Development Plan, adopted in 2002, and to update the policies in the Consolidated Local Plan (2015) which have not been reviewed since the original Core Strategy was adopted in 2010. To that extent it has been necessary to examine the updated policies and proposals alongside the existing unchanged parts of the Consolidated Local Plan to determine the overall soundness and legal compliance of the Local Plan.

I have set out below under Matters 1 to 3, the main issues and questions for examination, based on my initial reading of the RBKCLPPR, the evidence base and the representations. Matter 1 covers questions related to legal compliance and the duty to co-operate. Matters 2 and 3 set out the questions on the soundness of the plan.

Hearings to discuss these questions are due to commence on Tuesday 27 February 2018 and are programmed to run over 6 days closing on Friday 16 March 2018. A timetable for the matters to be discussed on each day is set out in the *Examination Hearings Programme*. The MIQs should also be read alongside the *Examination Guidance Notes* which contains information on the hearings procedure, what you will need to do if you wish to participate and the format of any hearing statements.

Each of these documents can be found on the Examination webpage at <https://planningconsult.rbkc.gov.uk/consult.ti/LPPRexam>

Abbreviations: IIA – Integrated Impact Assessment; LDS – Local Development Scheme; London Plan – LP; NPPF – National Planning Policy Framework; PPG – Planning Practice Guidance; PPTS – Planning Policy for Travellers Sites; RBKCLPPR – Royal Borough of Kensington and Chelsea Local Plan Partial Review.

Matter 1 - Legal Compliance and Duty to Co-operate

Issue 1a: Duty to Co-operate

1. In preparing the RBKCLPPR, has the Council complied with the requirements of the Duty to Co-operate¹, with particular reference to:
 - a. The relevant strategic matters to which the duty applies as defined by S33A(4) of the Planning and Compulsory Purchase Act?
 - b. The relevant local authorities and prescribed bodies as defined by S33A(1) in terms of co-operating on these strategic matters?
 - c. Whether the Council has engaged constructively, actively and on an ongoing basis with these organisations on the relevant strategic matters?
 - d. In the light of the Council's Response to the Inspector's Initial Questions (CED001) (questions 15 and 16) has the Council complied with the Duty to Cooperate in respect of the management of waste? What is the current status of the Memorandum of Understanding between the authorities in the Western Riverside Waste Authority on the pooling of waste apportionments and the available capacity for waste streams?

Issue 1b: Other Legal Requirements

1. In preparing the RBKCLPPR has consultation been undertaken in accordance with the Council's adopted Statement of Community Involvement (SCI) (SUB12) and the consultation requirements in the Regulations²?
2. Do the scope, content and timescale for the preparation of the RBKCLPPR accord with the Council's latest Local Development Scheme (SUB14)³? In the light of the Council's Response to Question 1 of the Inspector's Initial Questions (CED001) are there any obvious omissions from the submitted plan, in terms of policies or aspects of policies which should have been reviewed?
3. Is the RBKCLPPR, including the Proposed Further Modifications published in October 2017 (CED004), in general conformity with the London Plan⁴?
4. Has the formulation of the RBKCLPPR been based on a sound process of sustainability appraisal (SA) carried out in accordance with the requirements of the Act⁵? In particular:
 - a. Have the likely environmental, social and economic effects of the RBKCLPPR been adequately and accurately assessed in the Integrated Impact Assessment (IIA) (SUB67-73)?
 - b. Does the IIA test the plan, its allocations and policies against all reasonable alternatives?
 - c. Is it clear how the IIA has influenced the RBKCLPPR and how mitigation measures have been dealt with?

¹ Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended)

² S19(3) of the Planning and Compulsory Purchase Act 2004 (as amended) and Regulations 18 and 19 of Town and Country Planning (Local Planning) (England) Regulations 2012

³ S19(1) of the Planning and Compulsory Purchase Act 2004 (as amended)

⁴ S24 of the Planning and Compulsory Purchase Act 2004 (as amended)

⁵ S19(5) of the Planning and Compulsory Purchase Act 2004 (as amended)

- d. Have the Proposed Modifications (SUB6) and the Further Proposed Modifications (CED004) been subject to SA?
 - e. Have the requirements for Strategic Environmental Assessment been met?
5. Is the RBKCLPPR legally compliant with respect to the Habitats Regulations⁶ and any requirement for appropriate assessment? How have the findings of the Habitats Regulations Assessment Screening Report (SUB65) influenced the RBKCLPPR?
 6. Does the RBKCLPPR, taken as a whole, include policies designed to ensure that the development and use of land in the Royal Borough of Kensington and Chelsea contributes to the mitigation of, and adaptation to, climate change in accordance with Regulations⁷?
 7. Has the preparation of the RBKCLPPR complied with Part 2 of the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Plan) (England) Regulations 2012 in all other respects?

⁶ Conservation of Habitats and Species Regulations 2010 (as amended)

⁷ Section 19(1A) of the Planning and Compulsory Purchase Act 2004 (as amended)

Matter 2 – Spatial Strategy

The questions under this matter will focus on the place based elements of the updated vision and spatial strategy of the RBKCLPPR. This includes the overall vision in CV1; the strategic objectives CO1-CO7; the proposals to suspend estate regeneration projects and delete Policy CH5, Chapter 7 Latimer and Site Allocations CA2, CA5 and CA8; and the visions for individual places in the borough in CV5-6 and CV8-15, together with the remaining Site Allocations CA1, CA3-4, CA6-7 and CA9-12.

Questions about the Quanta of Development set out in Policy CP1 are considered under Matter 3 as part of discussion of the Delivery Strategy, particularly those relating to the housing target and supply and the quanta of office and retail development.

Issue 2a: Vision and Strategic Objectives (CV1 and CO1-7)

1. Has the vision for Kensington and Chelsea to 2028 as reflected in the proposed changes to CV1 and the strategic objectives CO1-CO7 been positively prepared?
2. Does it remain justified as the most appropriate strategy for the Royal Borough?
3. Is it in general conformity with the London Plan?
4. Will it support the delivery of sustainable development in accordance with national policy?

Issue 2b: Estate Regeneration (Policy CH5, Chapter 7 and Site Allocations CA2, CA5 and CA8)

1. What bearing does the Council's proposal to suspend estate regeneration projects in the borough have on the overall vision and spatial strategy for Kensington and Chelsea?
2. Is the proposal to delete Policy CH5 and Site Allocations CA2 (Barlby-Treverton), CA5 (Silchester Estates) and CA8 (Warwick Road Estate) and the whole of chapter 7 (Latimer) and address these areas of the borough in an early review of the Local Plan justified as the most appropriate strategy for the RBKCLPPR?
3. Would the vision and spatial strategy remain robust, effective, in general conformity with the London Plan and consistent with national policy in enabling the delivery of sustainable development over the Plan period without these estate regeneration proposals?
4. Should these changes be reflected in any further modifications to the vision in CV1? If so what changes should be considered?

Issue 2c: Places and Site Allocations (Policy CP2, Visions CV5-6, CV8-9 and CV11-15, and Site Allocations CA1, CA3-4, CA6-7 and CA9-12)

Policy CP2 - Places

1. Is the strategic Policy CP2, in combination with the visions and principles, priorities and delivery expectations in each of the place chapters, consistent with national policy and is it capable of being applied effectively in future development management decisions?

Vision for Kensal (CV5) and Kensal Canalside Opportunity Area (CA1)

2. Given the strategic importance of Kensal for the delivery of housing and new transport infrastructure in the borough, are the updated vision for Kensal to 2028 (CV5) and the allocation for the Kensal Canalside Opportunity Area (CA1), as proposed to be modified in SUB6 and CED004, sound? In particular:
 - a. Have they been positively prepared and is the mix of uses proposed justified as the most appropriate strategy for this area?
 - b. Are they based on effective joint working which addresses cross-boundary strategic priorities, including the relationship with Old Oak Park Royal?
 - c. Are they in general conformity with the London Plan and are they consistent with national policy in enabling the delivery of sustainable development?
 - d. Will they be deliverable over the plan period, including the quantum of residential development proposed to 2031/32 and the proposed new road and rail infrastructure?
 - e. Should the vision allow greater flexibility for residential uses within the Kensal Employment Zone to support the delivery of the housing target?
 - f. Should the vision and site allocation policy be modified to allow for the development of the Kensal Canalside with or without a new railway station?
 - g. Should reference be made to the Tier II Archaeological Priority Area at Kensal Green Cemetery as part of the site or area constraints?
 - h. Do any of the 'minor modifications' proposed to Policy CA1 and its reasoned justification materially affect the Plan? Should they be considered as 'main modifications' necessary for soundness?

Vision for Golborne (CV6) and Site Allocations for Wornington Green and Land adjacent to Trellick Tower (CA3 and CA4)

3. Are the updated vision for Golborne to 2028 (CV6) and site allocation policies for Wornington Green (CA3) and land adjacent to Trellick Tower (CA4) sound? In particular:
 - a. In the light of the withdrawal of estate regeneration proposals elsewhere in the RBKCLPPR, is this the most appropriate approach to regeneration at Wornington Green and adjacent to Trellick Tower?

- b. Is the quantum of housing proposed at Wornington Green and land adjacent to Trellick Tower deliverable within the first 5 years after the adoption of the RBKCLPPR?
- c. Will the vision (CV6) and site allocation policies CA3 and CA4), combined with other relevant policies in the Plan, ensure the delivery of sustainable development in Golborne in accordance with national policy, including its protection of heritage assets and open spaces?

Vision for Earl’s Court (CV8) and Site Allocations for Earl’s Court Exhibition Centre (CA6) and Warwick Road sites (CA7)

- 4. Given the importance of this location for the delivery of new housing and commercial floorspace in the borough over the plan period, are the updated vision for Earl’s Court to 2028 (CV8) and the sites allocations for the Earl’s Court Exhibition Centre (CA6) and the Warwick Road sites (CA7) sound? In particular:
 - a. Have they been positively prepared and is the mix of uses proposed justified as the most appropriate strategy for this area?
 - b. Are they based on effective joint working which addresses cross-boundary strategic priorities with the London Borough of Hammersmith and Fulham?
 - c. Are they in general conformity with the London Plan and are they consistent with national policy in enabling the delivery of sustainable development?
 - d. Will the combination of sites be deliverable, including the quantum of residential development proposed within the first 10 years of the Plan period and the quantum of commercial floorspace proposed for the Earl’s Court Exhibition Centre site?
 - e. Are the minimum dwelling numbers for each site justified?
 - f. Are the site allocation policies CA6 and CA7 justified and consistent with national policy in respect of their approach to infrastructure and planning obligations?

Vision for Lots Road/World’s End (CV9) and Site Allocations for Lots Road Power Station (CA9) and the Site at Lots Road (CA10)

- 5. Are the updated vision for Lots Road/World’s End to 2028 (CV9) and the site allocation policies for Lots Road Power Station (CA9) and the Site at Lots Road (CA10) sound? In particular:
 - a. Has the vision for Lots Road/World’s End been positively prepared and is it justified and deliverable in respect of its priorities for public transport improvements?
 - b. Are the vision in CV9 and its supporting text and Policy CA9 for the Lots Road Power Station site in general conformity with the London Plan in respect of the safeguarding of Cremone Wharf?
 - c. Should reference be made to the Tier II Archaeological Priority Area at Chelsea Riverside as part of the site constraints for CA9 given that part of the site falls within it?

- d. Has Policy CA10 for the Site at Lots Road Site been positively prepared in respect of the quantum of commercial floorspace proposed?
- e. Does Policy CA10 effectively address the cross-boundary relationship with that part of the site within the London Borough of Hammersmith and Fulham?
- f. Do any of the proposed 'minor modifications' to the vision in CV9 and site allocation policies CA9 and CA10 materially affect the Plan? Should they be considered as 'main modifications' necessary for soundness?

Vision for Notting Hill Gate (CV11)

- 6. Is the updated vision for Notting Hill Gate (CV11) sound? In particular:
 - a. Has it been positively prepared and is it justified as the most appropriate strategy for Notting Hill Gate?
 - b. Is it effective in identifying opportunities for development and redevelopment?
 - c. Is it in general conformity with the London Plan?
 - d. Is it consistent with national policy in enabling the delivery of sustainable development in Notting Hill Gate?

Vision for Kensington High Street (CV12)

- 7. Is the updated vision for Kensington High Street (CV12) sound? In particular:
 - a. Do the proposed 'minor modifications' MINOR/036 and MINOR/037 materially affect the future consideration of development in Kensington High Street? Should they be regarded as 'main modifications' which are necessary for soundness?
 - b. Are the other modifications to the vision suggested in representations necessary for soundness?

Vision for Knightsbridge (CV13)

- 8. Is the updated vision for Knightsbridge (CV13) sound? In particular is the priority to retain a social and community use in the former fire station justified as the most appropriate strategy for this site, in the light of the centre's national and international role as a shopping destination?

Vision for South Kensington (CV14) and Strategic Cultural Area (Policy CF11)

- 9. Is the updated vision for South Kensington (CV14) sound? In particular:
 - a. Is it justified and effective, in combination with Policy CF3, in seeking to protect A1 retail uses and resist a further increase in Use Class A3 and A4 food and drink uses within South Kensington?
 - b. Does the proposed 'minor modification' MINOR/038 to paragraph 14.2 materially affect the vision for South Kensington? If so should it be considered as a 'main modification' which is necessary for soundness?
 - c. Is paragraph 14.5 in respect of the delivery of the vision justified and effective and consistent with national policy in balancing the commercial

- needs and heritage interest of the main institutional buildings in South Kensington?
- d. Is the vision, in combination with the policy for the South Kensington Strategic Cultural Area (CF11), otherwise positively prepared and justified in respect of its approach to Exhibition Road and the Strategic Cultural Quarter?
 - e. Does the vision in combination Policy CF3 provide an effective strategy for Brompton Cross as a District Centre?
 - f. Are the other modifications to the vision suggested in representations necessary for soundness?

Vision for Sloane Square/King's Road (CV15) and Chelsea Farmer's Market site (CA12)

10. Is the updated vision for Sloane Square/Kings Road (CV15) and the Site Allocation for Chelsea Farmer's Market (Policy CA12) sound? In particular:
 - a. Is the vision positively prepared, justified and based on effective joint working in respect of its proposals for a Crossrail 2 station in King's Road?
 - b. Should the policy for Site Allocation CA12 make reference to the safeguarding of Chelsea Farmer's Market for Crossrail 2?
 - c. Is the updated vision, in combination with existing Policy CK1, effective in its protection of hospitals and centres of medical excellence and research within the Sloane Square/King's Road area?

Matter 3 – Delivery Strategy

Issue 3a: Diversity of Housing (Policies CP1 and CH1-CH6)

Housing Target (Policies CP1 and CH1)

1. Has the RBKCLPPR been positively prepared and is it justified, effective, consistent with national policy and in general conformity with the London Plan in relation to its aim in Policies CP1 and CH1 to meet and exceed the London Plan target for new homes in the borough of a minimum of 733 net additional dwellings a year?

Housing Supply (Policy CP1)

2. In the light of the suspension of estate regeneration schemes put forward in the Further Proposed Modifications (CED004), is there an adequate supply of housing to meet the housing requirement identified in Policies CP1 and CH1 over the Plan period? If not, is this consistent with national policy and the London Plan and what steps are proposed to ensure the borough can effectively meet the London Plan target over the Plan period?
3. Does the RBKCLPPR, as amended by the Further Proposed Modifications, demonstrate a robust 5 year supply of deliverable housing sites allowing for a suitable buffer to address past under delivery?
4. What evidence is there to demonstrate that the sites listed in the housing trajectory in chapter 40 of the RBKCLPPR and in Appendix 1 to core document SUB43.1 are capable of delivering the required number of units between 2017/18 and 2021/22?

Amalgamations and Very Large Units (Policy CH1)

5. Is the policy on amalgamations and restricting very large units set out in criteria b, c and d of Policy CH1 justified in Kensington and Chelsea? Is it in conformity with the London Plan and consistent with national policy?
6. Is the threshold of 170 square metres (sqm) justified as the maximum limit for large units where a single dwelling is lost? What evidence is available to support this figure? Would a higher threshold be justified?

Affordable Housing (Policy CH2)

7. Is the approach to affordable housing set out in Policy CH2 justified, consistent with national policy and in general conformity with the London Plan? In particular:
 - a. Is the 35% target justified by viability evidence and consistent with the London Mayor's strategic target of 50% across London?
 - b. Is a threshold of 650 sqm or more justified in relation to national policy, the Written Ministerial Statement and the London Plan?
 - c. Is the tenure split of 50% social rent and 50% intermediate housing justified by the evidence base and is it in general conformity with the London Plan targets?
 - d. Is the use of Existing Use Value plus as the threshold land value in viability appraisals justified by the evidence and consistent with national policy? Where is this term defined?

- e. Is the exemption of the borough from Vacant Building Credit justified by the evidence and consistent with national policy?
- f. Are the proposed 'main modifications' to Policy CH2 and its reasoned justification in respect of starter homes and the definition of affordable housing justified in the light of emerging changes to national policy announced following the Housing White Paper?

Housing Size Mix and Standards (Policy CH3)

8. Is the approach to housing size mix and housing standards contained in Policy CH3 justified by the evidence and is it consistent with national policy and in general conformity with the London Plan? In particular, is a more targeted approach, with an emphasis on delivering a greater proportion of smaller housing units justified by the evidence?

Specific Housing Needs (Policy CH4)

9. Is Policy CH4 seeking support for a range of specialist housing needs, including older people, houses in multiple occupation, student housing, self-build, hostels and supported housing justified by the evidence and consistent with national policy and the London Plan?

Gypsy and Traveller Accommodation (Policy CH6)

10. Is the RBKCLPPR's approach to providing for gypsy and traveller accommodation in the borough as set out in Policy CH6 and the supporting evidence base, positively prepared, justified and consistent with national policy in the NPPF and the Planning Policy for Travellers Sites? In particular:
 - a. Has the joint Gypsy and Traveller Accommodation Needs Assessment robustly and comprehensively assessed all needs arising from within the community based on the PPTS definition of gypsies and travellers?
 - b. Has the duty to co-operate been employed sufficiently widely in the search for additional pitches?
 - c. How will future sites be brought forward to address the identified shortfall in the need for pitches?

Issue 3b: Fostering Vitality (Policies CP1 and CF1-CF8)

Retail Development and Town Centres (Policies CP1 and CF1-CF3)

1. Does the RBKCLPPR make adequate provision to meet the need for additional retail floorspace identified in Policy CP1?
2. Is the Plan consistent with the expectations of national policy in allocating a range of suitable sites within town centres to meet in full the retail, leisure, commercial, office, tourism, cultural and community needs of the borough?
3. Is the threshold of 400 sqm for retail impact assessments for new shops in the reasoned justification to Policy CF1 justified and consistent with national policy?
4. Is Policy CF3 positively prepared, justified and consistent with national policy in respect of its approach to non-A1 uses within existing town centres? In particular:
 - a. Is the resistance to changes of use from Class A1 to Class A2 uses in paragraph 31.3.30 consistent with the GPDO?
 - b. Is the reduction to 50% of units remaining within A1 use in secondary frontages justified by the evidence?

Business Uses (Policies CP1 and CF5)

5. Does the RBKCLPPR make adequate provision to meet the need for additional office floorspace identified in Policy CP1? If not, is this justified and consistent with national policy? How would any shortfall be addressed in the Plan?
6. Are the restrictions on the loss of office space throughout the borough in Policy CF5 justified by the evidence and consistent with national policy and the London Plan?
7. Is the restriction on residential uses within Employment Zones in paragraph k of Policy CF5 justified by the evidence? Should the proposed modification to paragraph 31.3.53 (MINOR/051) to clarify the approach to residential uses in Employment Zones be considered as a 'main modification'?
8. Is the protection of warehousing throughout the borough justified, consistent with national policy and in general conformity with the London Plan? Would the proposed modification to paragraph 31.2.48b (MINOR/049) materially affect the consideration of changes of use of warehouses? Should it be considered as a 'main modification'?

Arts and Cultural Uses (Policy CF7)

9. Is Policy CF7 and the changes to the reasoned justification justified in allowing ancillary A class uses within cultural institutions to be exempt from retail impact assessments and enabling development in former arts and cultural buildings? Is this consistent with national policy?

Hotels (Policy CF8)

10. Is Policy CF8 justified in protecting hotels from conversion to other uses and is this in general conformity with the London Plan in respect of the location of hotels?

11. Is the proposed modification to Policy CF8 set out in the Council's Response to the Inspector's Initial Questions (CED001) justified in support of the Council's preferred strategy of enabling the development of new hotels and bed spaces across the borough? Would it materially alter the Plan? Should it be treated as a 'main modification'?

Issue 3c: Respecting Environmental Limits (Policies CE1-CE5)

Climate Change (Policy CE1)

1. Are the changes to Policy CE1 in the RBKCLPPR justified and is the policy as revised consistent with national policy and in general conformity with the London Plan?
2. Does the proposed modification MINOR/069 to the reasoned justification adequately address the need for further guidance on water efficiency and other aspects of sustainable design to address climate change? Should it be considered as a 'main modification' which is necessary for soundness?

Flooding (Policy CE2)

3. Are the changes to Policy CE2 in the RBKCLPPR justified and is the policy as revised consistent with national policy and in general conformity with the London Plan in respect of flood risk from tidal and surface water?

Waste (Policy CE3)

4. Is Policy CE3, as revised in the RBKCLPPR, positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan in meeting the borough's waste apportionment targets and delivering an effective waste management strategy for the borough? In particular:
 - a. Is there a signed agreement in place to pool the London Plan waste apportionment figures within the Western Riverside Waste Authority area?
 - b. If not what measures are proposed to manage any shortfall in waste arisings in the borough to the end of the plan period?
 - c. Should the Plan commit to identifying and safeguarding further sites for waste management in the borough?
 - d. Do the proposed modifications (MINOR/071-073) to the reasoned justification to policy CE3, including the deletion of the apportionment capacity gap table, ensure an effective, justified and positively prepared plan in respect of waste? If so should they be considered as 'main modifications' necessary for soundness?

Air Quality (Policy CE5)

5. Are the changes to Policy CE5 in the RBKCLPPR justified and is the policy as revised consistent with national policy and in general conformity with the London Plan in respect of managing the impact of development on air quality in the borough?
6. Are any further changes necessary in respect of the control of NO₂ emissions in the light of the Government's Air Quality Plan published in July 2017 and the London Mayor's latest proposals for the Ultra-Low Emission Zone?

Issue 3d: New and Enhanced Rail Infrastructure (Policy CT2)

7. Is Policy CT2 positively prepared, justified and based on effective joint working in respect of its safeguarding proposals for a Crossrail 2 station in King's Road?

Issue 3e: Parks, Gardens, Open Spaces and Waterways (Policy CR5)

8. Is Policy CR5 as updated in the RBKCLPPR consistent with national policy and in general conformity with the London Plan? Is it justified in requiring all development to contribute towards improving open space?
9. Would the designation of a Local Green Space at Meanwhile Gardens in Golborne be justified as part of RBKCLPPR? Would this be necessary for the soundness of the Plan?
10. Should consideration be given to other aspects of Policy CR5 as part of this partial review, including a full review of indoor and outdoor recreation facilities, biodiversity enhancements on key waterways and the designation of Local Green Spaces? If not when would these issues be considered?

Issue 3f: Heritage Assets – Listed Buildings, Scheduled Ancient Monuments and archaeology

11. Is Policy CL4 consistent with national policy in respect of the protection of heritage assets most at risk? Would further modifications to the policy to address the approach to heritage assets most at risk as set out in paragraph 126 of the NPPF ensure the soundness of the policy?

Issue 3g: Infrastructure Delivery and Planning Contributions (Policy C1)

12. Is Policy C1 and its supporting text consistent with national policy in respect of the neighbourhood portion of the Community Infrastructure Levy?
13. Do the proposed modifications to the infrastructure schedule in chapter 37 materially affect the Plan? Are they necessary to ensure the effectiveness of its policies? If so should they be considered as 'main modifications' to the RBKCLPPR?

M Hayden

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