

## **New Local Plan Review**

### **Summary of Consultation Responses: Borough Issues**

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## Summary of key issues

Please note this is intended to be a summary of the representations received. The comments received, and the Council's response is included in the detailed consultation schedule.

### 1. Introduction

#### **Q 1.1: What do you think should be included in the New Local Plan's vision?**

Comments from 47 stakeholders were received.

Those who responded did not object to the suggested elements of the possible vision *per se*. However, a number of comments were made requesting a change in emphasis, or in some cases, those issues which the consultees felt were not properly addressed.

The comments received can be categorised as follows:

- A need to be more explicit in its ambition to reduce inequality of all forms;
- Emphasis on high quality design. This should have two elements: the quality of new design and the protection of our existing built heritage/ townscape;
- A need to support the economy should be central. This has a number of parts: the need to provide for employment opportunities for all and to support sustainable economic growth. This means both encouraging the protection of existing employment premises and the provision of flexible new spaces;
- Greater support for a walkable neighbourhood and for the protection of those facilitates values and uses by residents;
- Need to provide new homes, but particularly those needed by local people. Support for various forms of affordable products;
- Need to provide increased open green space and protecting the visual integrity and harmony of the borough;
- Need to protect the harmony across the borough and the amenity of our residents. Some suggested that this should be prioritised against the need to support our town centres;
- The borough should be become an international destination for the arts
- Need to support green modes of transport;
- There is an over emphasis of the promotion of cycling and a need to reflect the difficulties associated with cycle lanes;

- A need for a succinct and jargon free vision, which does not over promise.

## 2. Distinctive Places of the Borough

**Q 2.1: Do you think we have identified the correct Places?**

**Q 2.2: Do you have any views on the visions for the Places?**

Comments from 38 stakeholders were received to question 2.1 and 34 to question 3.2. No new places were identified. However, a number of comments were made about what the visions should contain. Given the overlap I have summarised the response to both questions below.

### **Kensal**

- The landowners supported the designation of Kensal as a “growth area” in terms of the Planning White Paper (PWP) possible zones, and the recognition that the site must provide a significant number of new homes;
- The Place must recognise the contents of the forthcoming Kensal SPD;
- Reference needs to be made to the need to respect Kensal Cemetery, and the impact that the proposed development may have upon it; and
- Support for the inclusion of a significant amount of new employment floorspace on the site.

### **Golborne**

- The setting of Trellick Tower (Grade II\*) will have to be carefully considered, as well as the nearby Oxford Gardens conservation area.

### **Earl’s Court**

- The majority of those who commented stated that given the scale and nature of the development the Council should produce an SPD;
- The vision must reflect the changing position of LBHF and that their housing estates are no longer included as part of the wider development site;
- The owners supported the designation as growth area in terms of the PWP possible zones;
- A need to increase connectivity to existing stations;
- The site should contain a significant cultural offer, and concern that this may no longer be possible;
- The scale of development must reflect the surrounding town scape;
- An opportunity for the Earl’s Court development to provide homes for vulnerable adults; and

- An opportunity to transform Earls' Court back into a green space with lower density buildings.

### **Notting Hill Gate**

A detailed response was received from local residents' associations. This can very broadly be summarised as:

- Need to support NHG as a location for creative businesses, rather than the more conventional office sector;
- A need for significant public realm improvements, tree planting and public art; and a
- Need to create a true neighbourhood centre, meeting the needs of local people, a centre characterised by a vibrant business sector but with a range of independent shops, makerspaces, galleries and other uses.

In addition, a representation was received suggesting that the Place should be combine with Portobello. This was countered with other comments reflecting the need to support Ladbrooke Grove as the gate way to Portobello.

### **Latimer**

The SQWNP made a detailed comment. This can be broadly summarised as:

- Latimer Road should be seen as a renewal zone and not as a growth zone in terms of the planning white paper;
- Need for a recognition that the SQWNP is part of the development plan for the area and that it should continue to take precedence over the local plan/ the local plan does not reverse the policies within the Neighbourhood Plan;
- The Council should consider amending the boundary of the Employment Zone, omitting properties to the north of the Westway;
- Expand the place to include the North Pole Road centre;
- The nearby Grenfell Tower site and Lancaster Road (West) should be excluded from the place; and
- The vision over promises – and should not raise false expectations. However, the idea that the area contains a range of creative businesses is supported.

In addition:

- Any development in the Employment Zone should not price out existing occupiers;

- Support for the Latimer Road industrial estate to be redeveloped to provide for small and medium businesses with housing above; and
- Latimer Road should not be included within Oxford Gardens CA.

### **Lots Road**

- There should be no more growth in “Lots Village”; and
- The Port of London Authority note the need to reflect safe-guarded wharf status of Cremorne Wharf. Include reference to agents of change

### **South Kensington**

- Its destination as a world-class cultural is supported;
- Need to draw the Strategic Cultural Area and district centre together – and to protect facilities for local residents;
- The benefits of redeveloping vacant and under-used land adjacent to South Kensington tube station should be recognised;
- Need to protect the amenity of those living in, or close to the centre.
- No support for new restaurants, and a need to recognise that the area is almost entirely residential in character;
- Support for new restaurants and for areas for tables and chairs to contribute to the vitality of the centre;
- Should reflect the need to upgrade the pedestrian subways to the museums; and
- Need to refer to the opportunity for new commercial galleries to build upon the “innovative art gallery cluster scheme” at Cromwell Place.

### **Knightsbridge**

- Support for its characterisation as an exclusive national and international shopping destination; and
- Need to support international reputation through high quality design and public realm.

### **Kensington High Street**

- The vision needs to be more aspirational – and not merely a “culture wash”

### **Portobello**

- Need to promote the provision of local and independent shops;
- Need to resist an over provision of restaurants;
- Further sign posting is required to attract visitors from Ladbrooke Grove rather than from Notting Hill gate; and

- Support for links to Golborne Road.



### 3. Locations for Future Development. A 'call for sites'

**Q 3.1: Are you aware of any sites that may be suitable for new development?**

The following sites were identified as having a potential for new development

- The Council owned sites on Lots Road
- 142A Highlever Road
- Latimer Road Industrial Estate
- 3a Crowthorne Road
- Earl's Court Opportunity Area
- Kensal Opportunity Area
- 136 Bramley Road
- The land beneath the Westway
- Kensington Forum
- Bridge Training Centre
- Friendship Centre, Wornington
- The Plaza 525 Kings Road
- Sloane Square House, Holbien Place.
- Back of house buildings at Natural History Museum
- Land around South Kensington Station
- Land at Darfield Way
- Land at Holland Road
- Land Between Ladbroke Grove and Portobello Road

In addition, the following non-specific type of site were also identified.

- Underground and rail stations
- Land around railways
- Some hotels which can no longer afford to upgrade

## 4. Blue-Green Future

### Issue 1: Climate change and building design

**Q 4.1: Should the NLPR support the use of innovative materials, techniques and technology to assist in the retrofitting of existing buildings to ensure greater sustainability bearing in mind in some cases this may come at a cost to the character of the existing building stock and of our conservation areas?**

Comments from 35 stakeholders were received and they can be largely categorised into one of three groups. With most falling into the first group:

- Supportive of the use of innovative materials, techniques and technology in retrofitting existing buildings, but expressly not at the expense of the character of the Borough's many Conservation Areas. In favour of finding the right balance between the two objectives.
- Very supportive of retrofitting existing buildings, arguing that climate change is a significant global challenge and addressing it should take precedence over other considerations such as appearance.
- Expressing serious concern about the potential damage to existing buildings and the character of the Borough, particularly in Conservation Areas, arguing that retrofit should not be carried out on any building within a Conservation Area.

The other key issues brought up in the responses were:

- Fire safety considerations of new materials.
- The potential negative impact of climate change policy on viability and achieving other planning objectives, e.g., provision of affordable housing.
- The need to consider other interventions over retrofit to address the impact of climate change in the Borough, such as urban greening, facilitating active and sustainable transport over the private car and unnecessary demolition and new build.

**Q 4.2: For listed buildings we will need to find a balance between bringing them up to high standards of sustainability and the need to preserve their special architectural or historic character. Do you have any comments on this approach?**

Comments from 29 stakeholders were received and they can again be largely categorised into the same three groups outlined above. With the vast majority falling into the first group:

- Supportive of the Council's aim to find the right balance between improving sustainability standards of listed buildings whilst also preserving their special architectural/historic character.
- A few responses were very supportive of retrofitting listed buildings, again arguing that climate change is a significant global challenge and addressing it should take precedence over other considerations such as the appearance of listed buildings.
- A number of responses expressed serious concern about potential damage to buildings with important historic and architectural value, arguing that preservation and protection of listed buildings should take precedence.

Two responses also highlighted the idea that preservation of listed buildings is actually sustainable in itself (in line with the whole life cycle carbon approach and circular economy) and questioned the need to consider retrofit.

Additionally, responses from RA's expressed concern about inappropriate implementation of insulation, which causes overheating in the summer leading to an increase of air conditioning units, along with their concern over potential changes to planning law in relation to basement development.

**Q 4.3: Should the NLPR require all new development to be net zero carbon? This means looking at the whole life cycle of development from the design and materials used during construction to how the building is used to ensure it does not generate any additional carbon. Carbon can also be reduced by using renewable energy sources to provide the energy needed by the building's residents and users.**

Comments from 36 stakeholders were received which can be categorised as follows:

- Very supportive of setting zero carbon requirements for new development, arguing that it will be critical if we are to meet 2030/2040/2050 targets and suggesting the Council support on-site renewables.
- Suggested zero carbon would be good but expressed doubts about its feasibility.
- Considered setting zero carbon requirements for all new development to be too onerous, would lead to issues of viability and a failure to deliver other planning gains.

- A few responses highlighted that monitoring will be a key element in setting zero carbon requirements and questioned how the Council would do this.
- In addition, a number of responses again highlighted that retention and reuse of existing buildings over demolition and new build is more important than setting net zero requirements for new development.
- A response also expressed concern over air quality in the borough and argued that setting net zero requirements is important to tackle that issue.

## Issue 2: Air quality

**Q 4.4: Should the NLPR require new developments to be “air quality neutral” at each stage of its life? This means that the emissions linked directly to the development such as for heating or travel will not lead to deterioration of air quality.**

Comments from 31 stakeholders were received in which many expressed serious concern about the poor air quality of the Borough, arguing that the Council must do everything in its power to improve the situation.

However, a number of responses objected to setting air quality neutral requirements on new development, arguing that it would be too onerous and too prescriptive, leading to a failure to deliver other planning gains and policy objectives.

Additionally, many comments expressed frustration with regard to traffic congestion across the borough, arguing that the Council should look to easing this through a more joined up approach with neighbouring boroughs such as Wandsworth, as well as facilitate active and sustainable transport.

A large number of comments also highlighted the importance of looking to urban greening, trees, as well as green open spaces such as parks, and support for on-site renewables as key interventions to improve air quality in the borough, which may be more impactful and less onerous than requiring new development to be air quality neutral.

## Issue 3: Noise and vibration

**Q 4.5: What noise and vibration sources should be addressed directly in the Local Plan?**

Comments were received from 33 stakeholders who identified the following noise sources that should be addressed in by the NLPR:

- Construction sites – demolition, construction, vibration, dust, debris,

- Traffic noise – road congestion, idling, HGV vehicles, road speed on Warwick Road in particular.
- Ventilation, plant and machinery – particularly extraction units, air conditioning units, air source heat pumps.
- Railway/underground line noise – call for these to be covered.
- Concern about increasing number of cafes/restaurants and the resulting increase in external ventilation and extraction equipment, but also increase in takeaway deliveries.
- RA's also identified light pollution and outside heaters as issues to address.
- A number of responses suggested the Council explicitly reference the Agent of Change Principle in the NLPR.

#### Issue 4: Flood risk

**Q 4.6: Should the NLPR take a more proactive approach to reducing the impact surface water (rain) flooding, and if so, how can the benefits of green infrastructure be maximised?**

27 stakeholders responded to this question. The issues they raised included:

- lack of knowledge by the residents and enforcement by the Council regarding impermeable paving in front gardens. The importance of resisting paving front gardens and its use for parking. Also, the need to resist hard surfaces in rear gardens and moving trees during development.
- The importance of maximising green space and its use for good quality SuDS.
- Support for being proactive, the use of natural flood management, soakaways, natural grass, water storage, water saving measures, reuse of rain and greywater, planting trees and shrubs, SuDS under roads, convert roads in green areas.
- How onerous the current policy CE2g could be specially in small development and the need to encourage innovative solutions. Other stakeholder supported the existing policy.
- The strategic role of the Mayor in terms of flooding and how the Council should follow the London Plan's SuDS policy and SuDS hierarchy.
- Basement development: support for the Council restricting basement development as it can have an impact on groundwater. Other stakeholder asked for the Council not to allow so many basements.
- Importance of Lead Local Flood Authority documents such as Surface Water Management Plans and Local Flood Risk Management Strategy to address surface water. The need to maximise SuDS' benefits and address different types of flood risk, not just surface water flooding.

## Issue 5: Biodiversity

### **Q 4.7: Do you have any ideas about how new developments can improve on biodiversity in the Borough?**

Comments from 28 stakeholders were received containing a range of ideas and suggestions which are listed below:

- Setting requirements for all development to introduce urban greening inventions such as green roofs, green walls, green verges, etc.
- Many responses pointed toward the benefits of trees and green open spaces, suggesting that the Council look to plant more trees and provide more green spaces.
- A number of comments highlighted that a good maintenance plan needs to be in place with any urban greening/biodiversity intervention to ensure it is impactful in the longer term.
- Important to connect green-blue corridors and networks to ensure wildlife is not isolated in pockets.
- Should ensure native plants and wildlife are used.
- Adopt the Urban greening factor requirements set out in the New London Plan.
- RA's suggest supporting community led gardening on estates and support gardening education initiatives.
- The PLA suggest referring to Estuary Edge guidance which is relevant for riverside development.
- A number of comments note that due to the constraints in a borough like RBKC and the typical scale of development the Council should aim to facilitate lots of small-scale interventions rather than focus on larger interventions.
- Finally, two responses suggested the Council facilitate a decrease in housing units and migration out of London, along with suggestions for establishing a borough zoo.

### **Q 4.8: Are there any areas which you think should be recognised for their importance to biodiversity? This will help us to consider them when we update our evidence on SINC areas.**

22 comments from stakeholders were received in which the following areas were identified:

- Grand Union Canal
- Little Wormwood Scrubs
- Holland Park
- Kensington Gardens
- River Thames

- NHM and NHM climate gardens
- West Brompton cemetery
- Underneath the Westway
- Westbourne Grove Turquoise Island and Westbourne Grove street/tree scape
- Royal Parks
- Earls Courts redevelopment site

In addition, responses identified the following 'general spaces' that should be recognised for their biodiversity importance:

- Parks and gardens
- Roof gardens
- Churches and Cemeteries
- Trees including veteran trees on Royal Crescent in Holland Park; Arundel Gardens and Stanley Crescent in Ladbroke Grove; Ladbroke Square Gardens; Old Church Street, Paultons Square in Chelsea; and the Chelsea Physick Garden.
- Garden Squares
- Private Gardens
- Community gardens, allotments and public planting sites
- Schools
- Paved areas
- Underground tube lines and alongside railway lines/banks
- Car parks
- Underneath bridges, including railway bridges
- Meanwhile gardens

## Issue 6: Green infrastructure

**Q 4.9: Should the NLPR take a more holistic approach to ensure green infrastructure and its benefits are maximised in new development? If so, do you have any suggestions how this may be achieved?**

30 stakeholders responded to Q4.9 and all offered their support for maximising green infrastructure in new development. The responses offered the following suggestions for how to achieve a more holistic approach to green infrastructure in the Borough:

- Requirements for development to have as many green roofs, green walls and green spaces such as gardens, squares parks etc. as possible. Including communal green spaces.

- The Council should be more supportive of roof terraces and roof gardens.
- Support for greening of meanwhile uses.
- Support community led gardening and support gardening education initiatives.
- Require development to meet relevant UGF scores set out in the NLP.
- Planting more trees across the Borough.
- Protection and enhancement of existing green corridors.
- The Labour Group of Councillors suggest the NLPR should add requirements for major development to install air purifying conditions both in new build and cover the cost of doing so in areas of poor air quality around the Borough.
- RAs suggested setting a requirement for 50% new development area to be garden based and highlighted the success of schemes such as Elgin Crescent.
- Historic England suggested that relevant policy should have regard for the benefits of green space for historic/heritage buildings and vice versa.
- Sports England advised that green infrastructure policies should ensure protection of green open spaces for use as sports/playing fields and pitches and facilitate multi-functional use.
- Utilise innovative ways of introducing plants such as have been suggested at public meetings of the Westway Trust.
- The Kensington Society suggest using the OPDC policy on biodiversity to inform relevant policy.
- Two respondents suggested demolition of high-rise tower blocks and.
- The Environment Agency suggest developing a riverside strategy.
- A number of comments suggested not setting requirements and just encouraging development to incorporate green infrastructure.
- There was also a call for more green infrastructure in the Earl's Court redevelopment plan.
- Finally, a number of responses suggested caution and called for flexibility due to the highly constrained nature of the borough, arguing that setting requirements for green infrastructure to jeopardise the viability of delivering other planning benefits such as affordable housing.



## Issue 7: Waste management

**Q 4.10: Should the NLPR support the Circular Economy approach and require development to prepare circular economy statements? If so should this be for all development or just major development?**

Comments were received from 25 stakeholders the vast majority of whom support setting requirements for proposals to prepare a circular economy statement. Most supported a proportionate approach, setting requirements for major development and simply encouraging non major development to give due regard to circular economy principles.

However, a number of responses including those from the RAs expressed a desire for the Council to introduce a policy presumption against demolition and rebuild and promote a retrofit first approach. They also requested the Council lobby the government to remove the VAT tax incentive on new build.

A minority of comments did object to a circular economy statement requirement, arguing that it would add to the developer's costs and risk the delivery of planning gains.

A large proportion of comments also highlighted issues around waste and recycling in the borough, arguing that the current process is not clear enough and that the Council should ensure more materials can be recycled, as well as adequate provision of bins and bin storage in homes and on the street.

## 5. Homes

Eight questions were asked on eight different housing issues. In total, 49 different respondents made 211 comments. The respondents were categorised in broad categories.

Category	Number	Total Number of Comments
Individual	21	80
Company	10	39
Resident's association	8	56
Public sector	4	12
Non-profit	3	14
Institution	2	4
Political group	1	6

On average 26 comments were made for each question. Q5.1 received most comments (34) while Q5.8 received less comments (18).

While some respondents answered most questions, some only answered one. There was an average of 4 comments per respondent.

The most prolific respondents (above five comments) are listed in the table below.

Name	Number of comments
Earl's Court Society (Malcolm Spalding)	8
Oonagh Wohanka	8
The Hillgate Village Residents' Association (Sophia Massey-Cook)	8
The Pembridge Association (Fiona Fleming-Brown)	8
CHRA (I. Margaronis)	8
KENSINGTON SOCIETY (Amanda Frame)	8
The Philbeach Residents' Association (Froment)	8
St Quintin and Woodlands Neighbourhood Forum (Henry Peterson)	7
Octavia Housing (Andrew Brown)	7
Linda Wade	7
Boka Hotel (Spencer Parsons)	7
C David	7

Lucia Scalisi	6
Sandra Yarwood	6
Grove and Company (Roger Grove)	6
Bikeworks CIC (David Dansky)	6
Sue Redmond	6
Tom Bennett	6
The Labour Group - RBKC	6
Savills	6
William Wilson	5
Fraslo Investment Holdings Limited (Will Kumar)	5
GLA (Hassan Ahmed)	5

### Issue 1: Delivering the homes that we need

#### Q 5.1: Do you have any comments on the above suggestions to improve delivery of homes on each site?

Comments from 34 stakeholders were received. The comments received can be categorised as follows:

- Oppose the delivery of new homes: Three respondents reject the argument that extra homes are needed and/or believe the housing target is unrealistic.
- Support to optimisation: Four respondents support maximising potential housing delivery as described in the issues document of the New Local Plan Review (NLPR). They recognise that the Borough is greatly constrained and support the use of opportunity areas and key large sites to deliver the housing needed. They also provide some suggestions to optimise housing delivery:
  - Local Plan should seek to optimise brownfield sites in regeneration area;
  - Support for well-designed, high-quality, and high-density developments;
  - Refer to the Policy D3 (Optimising site capacity through the design-led approach) *“Development proposals should optimise their site-specific context”*
  - References and examples to the continental model of apartment building: *“In both Germany and Scandinavia seek to mitigate the impact of living in small units by including communal features such as laundry and secure storage rooms in basement areas to ensure*

*that precious living space is not taken up by the replication of equipment or storage units.”*

- Oppose size restriction: Some of the respondents supporting optimisation are against setting maximum floorspace sizes for homes. Among them, some believe in removing barriers and letting the market decide what types of homes should be supplied. An interesting point made by the Kensington Society is that *“Policy CH1(d) is potentially misleading as its heading “Restrict very large units” is just one aspect of sub-optimising the density of development of housing sites. Too often developers have been advised to change the housing mix because they were sub-optimising the use of the site – see Holland Park School South Site (Native Land), 80 Holland Park (Candy and Candy).”*
- Permit higher densities: Three respondents expressed support to higher density and/or taller buildings.
- Repurposing offices: Three respondents suggested that office spaces are repurposed for housing, especially following the COVID-19 pandemic. One respondent referred specifically to Latimer Road.
- Buy to leave, empty homes and land banking: A large number of comments (seven) related to the buy to leave phenomenon and empty properties in general and an emphasis on the top-end prime sector. The premise is that the prime market hinders the delivery of enough homes, instead large properties remaining vacant are built. They believe that limiting the floorspace of new homes is a good idea. Those who are concerned that developers are land-banking believe there should be taxes on developers who make no meaningful progress on their projects.
- Delivering the right types of homes: Several comments, while not responding directly to the question purports that the quality of the homes built is more important than the quantity. For example: *“A lesson from re-housing the wider Grenfell community is that we do not have enough family-sized social housing. On social housing, we should sacrifice numbers of units to improve the balance in larger properties that we are currently lacking.”*

The GLA recommends the NLPR to incorporate the role that small sites can play in delivering housing in accordance with Par 4.1.8 and 4.2.1 of the New London Plan.

**Q 5.2: Do you have any other ideas to improve housing delivery in the Borough?**

Comments from 29 stakeholders were received. The responses bring up similar issues to Q 5.1. The comments received can be categorised as follows:

- Change of use: Eight respondents believe that the Local Plan should allow a more flexible approach to the change of use to convert offices or shops into housing. Some of the comments are more nuanced and believe only offices that were originally built as housing should be converted back into residential.
- Reduce build-out time: Another area of concern is around encouraging developers to build out development shortly after getting planning consent to avoid land banking. Five respondents mentioned this issue. This issue was also mentioned in responses to Q 5.1.
- Oppose housing as investment: This category incorporates different ideas: vacant dwellings, buy to leave, overseas buyers, short term letting. There is a lot of concern that housing is used as an investment vehicle rather than serving its purpose of housing people and these mechanisms should be stopped.
- Other respondents support higher density, building houses above shops, focus on housing sites, setting a limit to floorspace. Finally, two respondents are opposing any form of new housing.

## Issue 2: Protecting existing homes

**Q 5.3: Do you think we should stop the loss of any homes as described above unless there is a robust case for an exception to be made?**

Comments from 25 stakeholders were received. Responses to the question were mixed.

Five respondents do not support further restrictions; they do not think the Council should stop the loss of homes through amalgamation or HMO conversion.

The rationale given is that small units are often associated with poor quality and that amalgamation should be allowed to provide units of a better quality. Furthermore, amalgamation allows for larger and much needed family-size units to be provided. Small units are also associated with short-term lettings and therefore restricting the amalgamation of small units would further exacerbate this issue. One respondent believes HMO conversion to studio apartments provide a valuable form of affordable market accommodation. Finally, some of the respondents argue against further restrictions because

*“planning policy cannot artificially control the supply and demand for housing”* and we should let the market decide.

On the other hand, three respondents agree with the Council that we should stop the loss of any homes. Alternative approaches that are suggested include *“where dwellings are divided a legal agreement should be put in requiring no letting as short lets”* and a policy that amalgamations should not lead to the loss of more than one housing unit.

Finally, three respondents favour a case by case approach. The HVRA response gives a good account of the negative consequence brought the amalgamation of bedsits but that it can also be positive in certain situations when helping families to expand. Other believe that we should allow amalgamating flats to better accommodate families as long as it does not require to knock off two building that were originally designed as two separate entities.

In summary, respondents expressed their concerns that further restrictions would make it difficult to improve sub-standards homes and fail to accommodate expanding families. Therefore, the case for an exception could be made to improve sub-standard units or allow a family to expand. Where this is proven, the size limit to be imposed should be *“supported by local evidence which demonstrates that it would prevent the loss of housing over the plan period”* as suggested by the comment made by the GLA.

Other comments were irrelevant or generally expressed their support to avoid demolishing existing buildings.

### **Issue 3: RBKC Community Housing**

**Q 5.4: It is unlikely that the Council can retain its affordable housing policy trigger of 650 sq. m as we will need to align our approach with the national and legislative changes. However, should we endeavour to do so if we have the evidence to support such a position?**

Comments from 26 stakeholders were received.

The responses are again very mixed. Eight respondents support to retain the affordable housing policy trigger of 650 sqm against seven who are against it. Those opposed to retaining the trigger express concerns around viability, deterring investment, strangling small developers and being unlawful. Two respondents (of which one is against retaining the trigger) believe the policy should take a ‘net uplift’ approach. This mean the affordable housing requirement should be applied to the net uplift of a residential scheme rather

than to the gross floorspace of the scheme. Ten other responses did not directly answer the question or were not linked to the issue.

**Q 5.5: Do you have any views on the housing products that we consider to be genuinely affordable? Given 25 per cent of affordable homes could be required by legislation to be First Homes for sale, should there be any other types of affordable housing in addition to those described above?**

Comments from 25 stakeholders were received.

Respondents are overwhelmingly against the introduction of First Homes (eight comments), while eight respondents emphasise the need to provide for social rented homes in the Borough. Other comments are in favour of a mix of affordable homes for specific groups (e.g. social tenants, key workers and first-time buyers). The term 'key workers' is brought up repeatedly (eight times). While the term is not defined, respondents do mention teachers, nurses and veterans. Downsizers and older people are also mentioned.

Three comments would like to encourage small 'co-operatives'. RBKC used to have a policy that supported small co-ownership housing associations to undertake the conversion of buildings into flats. The Borough would lend the funds and provide 100% mortgages to be repaid on 99-year leases.

One of the comments expressed support for BtR development but contested the Community Housing SPD approach which states that "*Council will seek a range of genuinely affordable homes with 70 per cent at social rent (or affordable rent where justified) and the remaining 30 per cent Discounted Market Rent (DMR) at LLR levels*" (Par 3.24), arguing that it is contrary to Par 4.11.10 of the New London Plan "*it is not appropriate to seek DMR at or close to social rent levels*". Therefore, the BtR policy of the NLPR should justify clearly why this approach is taken, with reference to the New Local Plan Par 4.11.10 "*Where justified in a Development Plan, boroughs can require a proportion of affordable housing as low-cost rent (social rent or London Affordable Rent on Build to Rent schemes*".

Finally, the GLA supports the Community Housing typology which is aligned with Par 4.6.3 of the New London Plan.

#### **Issue 4: Housing for older people**

**Q 5.6: Do you have any views on older people's housing provision in the Borough both in terms of the support the NLPR needs to provide and the type of accommodation to be provided? If you were moving to older peoples' housing what would you like to see?**

Comments from 32 stakeholders were received. The comments received can be categorised as follows:

- 1) Six respondents explicitly support the provision of housing for older people and/or reports the lack thereof. Policy CH4 of the adopted Local Plan (2019) should be retained and strengthened in the NLPR.
- 2) Comments on the 'types' of accommodation to be provided:

Several respondents specify the types of accommodation to be provided. The following 'types' can be noted: homes that are adaptable for changing care needs (e.g. Lifetime standards), homes in self-ownership and self-managed, extra care housing, both affordable and high-end extra care and sheltered housing, homes for older people to downsize into, affordable accommodation (as recent delivery has presumably focused on the high-end market), and housing for people with learning disabilities. While an element of affordable housing is needed, the local need for private provision should also be considered. One of the comments proposes the following types: independent purpose-built accommodation; nursing/step-down provision after hospitalisation and care; dementia care; and Extra Care. These types should be delivered in the following tenures: social affordable rent; social intermediate rent; and home ownership. Finally, policies should be informed by locally evidenced need. In their absence, the NLPR should reflect the benchmark set out in the New London Plan. One of the respondents also expressed that the NLPR should have a clearer definition of how use classes relate to specialist accommodation in the Borough.

- 3) Comments on the management style and/or the delivery of older peoples' housing. Various views and suggestions are included here:

On delivery:

- The NLPR should consider that different housing types should be subject to different affordable housing thresholds and requirements.
- The market should respond to the different needs of older people if allowed.

On management:

- Not-for-profit companies should be selected by the Borough to run housing estates and care homes (e.g. Anchor/Hanover housing in Hackney).
- There should be low service charges.

- 4) Comments on the quality of the accommodation



Many comments are related to the quality and overall design of the schemes. Several respondents highlighted the importance of green spaces and communal areas. Other concerns are around accessibility and safety. For example, the schemes should be located near public transport but safe and designed with the elderly in mind (e.g. handrails, ground floor access). Inter-generational housing should be encouraged, to avoid creating ‘ghettos’ of retirement housing. Some specific requirements are also discussed such as Wi-Fi connectivity and issues around insulation and cooling. Evelyn Fox Court is given as a good example of supported living.

### Issue 5: Other housing products

**Q 5.7: Do you have any comments on the other forms of housing set out above or any information that may help support the evidence?**

Comments from 22 stakeholders were received. The comments received can be categorised into three broad themes:

- More control and regulation in the private rented sector. Respondents are concerned that the private rented stock and HMOs are being lost to large housing units and short-term holiday lets. There is general support around protecting HMOs except for one respondent who believe *“we should continue to allow remaining HMOs to be converted to smaller numbers of units that meeting acceptable modern standard for living.”*
- Support for BtR
- Various other relevant issues include protecting low-cost housing, supporting the provision of a variety of tenures, providing intermediate rented housing for workers including shared living. There is a single comment on spreading social housing across the Borough instead of concentrating it in one location.

### Issue 6: Estate renewal policy

**Q 5.8: We consider that most parts of the retained policy CH5 are still fit for purpose, but it can be updated to be further strengthened as described above. We would be guided by the community on this. Please provide us with your views.**

Comments from 18 stakeholders were received. They were generally supportive of retaining Policy CH5 and strengthening it. In particular, several comments supported a net increase in the provision of social rented homes, in line with the new London Plan. Other comments were in favour of including a commitment to require consultation with residents for all estate schemes. Respondents supported retaining and providing additional open green space

and other amenities, especially in the context of densification. Finally, there was some emphasis on social mixing and rehousing existing tenants.

## 6. Town Centres

### Issue 1: Covid-19 recovery and maintaining the vitality of our centers

**Q 6.1: Are there any measures introduced as part of the Covid-19 recovery which should be used elsewhere in the Borough, or which should be made permanent?**

Comments from 28 stakeholders were received.

There is no consensus. 10 of the comments received rejected the uses of cycle lane on the basis that there were either inherently dangerous, used by those who acted dangerously or were little used. This compared to the 5 comments who took a more positive approach. 3 consultees were concerned that the needs of walkers and cyclists had been combined, but are, in reality, incompatible.

There was, however, support for improvements to the public realm which could make our town centres more pedestrian friendly and pleasant places to visit. (7) 4 consultees supported the creation of more informal seating areas, with Pavilion Road given as an example of improvements which are successful. Others (4) supported initiatives such tree planting and benches (along with a removal of clutter) to support those looking to walk.

8 comments were received which could be described as being generally supportive of licensing and other measures to support a diversification of our centres. However, most of these respondees did recognise the importance of protecting the amenity of those living near by. 4 comments were received which were more negative, and stressed the need for tighter (planning and licensing) controls if the living conditions of residents are to be protected. Once comment was received which sought to remind the Council that, “South Kensington is a profoundly residential area”.

### Issue 2: The future nature of our town centres

**Q 6.2: Should the Local Plan encourage the development of an evening economy in any of the Borough’s larger centres?**

Comments from 29 stakeholders were received.

There is broad support (20 comments) for the Council to support the evening economy, with many noting the contribution that a thriving restaurant culture can have in supporting our town centres, and adding to the quality of life of those who live within the borough. However, the majority of those who could be described as “positive” also recognised the potential for conflict with

residents living in the vicinity and the need to very carefully manage such uses. The licensing regimes was noted as being key in this regard, but the Council also has a role in reducing disturbance through waste clearance, air conditioning and extractors and the servicing of buildings.

Those representing landowners in Earl's Court, King's Road, Kensal and South Kensington perhaps unsurprisingly endorsed these areas as being suitable for having a significant "evening" element.

It should be noted that 5 comments were received which took the contrary view, and that entertainment or F and B uses should not be supported. Only one was place specific, with a one residents association "strongly opposing that the [South Kensington] museum district should be designated as an entertainment quarter" given that the "locality is profoundly residential".

With regard cultural uses, the same RA took the view that whilst the Council should help "cultural institutions get back on their feet" they would be strongly opposed to any suggestion that attracting visitors is a beneficial aim in itself.

2 comments were received which supported the inclusion of a new significant cultural venue at Earl's Court.

**Q 6.3: What would you like us to encourage in terms of uses and public realm improvements in our larger town centres? Can you be specific to the centre.**

A single response was received to this question, with Sports England encouraging the Council to support sport and recreation uses to increase the diversity of our centres. Other comments were received with regard visions for individual centres. These are reported elsewhere in this document.

## 7. Business and Culture

### Issue 1: The provision of offices

**Q 7.1: Should the Council continue its current approach and, when it can, protect all offices across the Borough, unless it can be established that there is no long-term future of an office in that location?**

Comments from 31 stakeholders were received.

The majority of comments received (19) reflected support for the protection of office floorspace, but only when it was shown to be needed in the post Covid-19 world. Where there was no demonstrable need for office floorspace the loss to residential may be appropriate. Many reflected on the value that offices had on the local economy, to a mixed and balanced community and in meeting the employment needs of our residents. 4 consultees specifically noted the value that offices have in supporting our town centres. Others noted the value of allowing flexibility in the commercial products available within the borough.

However, a small number of our respondees (4) took a much more laissez-faire approach and were happy for the “market to decide”, even were this to result in the loss of office floorspace which was still occupied. Others (3) were happy to see the loss of offices when in properties which had not been purpose-built as offices, or when the office did not lie within a town centre. One consultee noted that Latimer Road was not a viable office location, whilst another was of the opinion that we must “fiercely protect our EZs.”

4 consultees referenced the recent changes to the E class, and the flexibilities available within it, noting that any new policy must fully reflect its provisions.

The GLA did not take a strong position other than to note the need for most up to date information when informing office need. They also referenced LP Policy E1, stating that the Council should look to explore the possibility of new offices in appropriate locations. These may include the CAZ, town centres and OAs.

**Q 7.2: Are there any parts of the Borough where it is no longer appropriate to protect offices, or any types of buildings which are inherently unsuitable for an office use?**

Comments from 17 stakeholders were received.

Whilst the majority of those who responded were supportive of the retention of offices where they still meet a need the following locations were identified as being potentially suitable for release:

- Upper floors above shops on the King's Road (1)
- Properties which were originally built as dwellings (3)
- Offices in residential areas (3)
- Latimer Road (1)
- Other Employment Zones (1)

3 Consultees took a view that loss should be decided on a case by case basis and one consultee stating that the market should be allowed to determine land uses throughout the borough.

It should be noted that the number of stakeholders favouring each option was very small.

3 consultees were of the view that whilst the need for traditional office premises may be low on upper floors in the Notting Hill Gate centres, there would be a demand for flexible maker-spaces and premises suitable for the creative sector and for start-ups.

**Q 7.3: Should the Council continue with its “business led” requirement for development within the Employment Zones?**

Comments from 13 stakeholders were received.

A number of the comments made noted the high degree of uncertainty around the office market in the post Covid-19 world as well as the freedoms offered by the flexible Class E use. In this context 7 of the comments made reflected the view that the borough's Employment Zones were of value but that a greater flexibility would be appropriate. Mixed use proposals may be appropriate as would proposals which did not bring forward additional business floorspace. The balance of uses within the Employment Zones need to be kept under review.

A representation from the SQWNF sought a much more flexible approach to the use of non-residential buildings in the Latimer Employment Zone. This noted that there was no merit in seeking to protect existing, or required new, uses when this would result in empty buildings. They went on to suggest the de-designation of parts of the Employment Zone should be considered.

3 consultees were of the view that there is no longer value in protecting commercial use within the Employment Zones as there was no longer a need for such uses. The market should be allowed to decide the land uses.

However, this view was not universal across all the Employment Zones, with 1 stakeholder supporting the current position with regard the Lots Road Employment Zone.

2 stakeholders noted the value of light industrial uses as part of the mix within the Employment Zones.

### **Issue 2: Light industrial uses**

**Q 7.4: Should the Council promote the provision of new premises which are suitable for new light industrial uses, and protect their loss to residential uses?**

Comments from 19 stakeholders were received.

8 comments were supportive of this, with some highlighting the need to protect car repair workshops and others to protect workshops for small businesses, artisans and artists or the technology and creative industries. However, some noted the difficulties of such an approach with the freedoms offered under the use classes order.

4 stakeholders took a different view suggesting that there was little value in protecting light industrial use and/or that the market was better placed to decide on land uses, particularly when providing new homes.

Others questioned the need for such a policy given the lack of such uses in the borough.

### **Issue 3: Affordable workspaces**

**Q 7.5: Should the Council require the provision of affordable workspaces for appropriate new commercial developments?**

Comments from 25 stakeholders were received.

Of these 13 comments were generally supportive, with some fully endorsing the proposal, but others being more cautious and recognizing that care must be taken to ensure the provision of affordable workspace does not have such an impact on the viability of the proposal as to stop it coming forward. The benefits to start-ups, for artists, artisans and the creative industries was noted.

10 comments were negative, questioning the need for such premises, or suggesting that they would have a significant impact on the deliverability of relevant schemes. One stakeholder identified Latimer Road as an area when the requirement to provide affordable workspace would discourage the

necessary investment. Others suggested that such space would be better used for new homes.

The GLA welcomed the Council's intentions, referencing Policies E2 and E3 of the London Plan.

**Q 7.6: Do you have a view on the most appropriate models to help provide these affordable workspaces, or, who should be eligible to benefit from such workspaces?**

Only a single response was received. Whilst this did not include a suggestion as to the appropriate model, it did suggest that such workspace should be available to small businesses and start-ups from within the ward and then the wider borough, before wider eligibility is considered.



## 8. Social and Community Uses

### Issue 1: Types of social and community use

**Q 8.1: Should any other types of use be included within the Council's definition of a social and community use?**

Comments from 14 stakeholders were received.

Following types of uses were suggested to be included in the definition of social and community use:

- Cultural uses (e.g. galleries, theatres, museums, rehearsal and dance space) (6)
- Open spaces (e.g. gardens squares, outdoor amenity spaces etc) (4)
- Activity and community centres for the elderly, infirm and people with physical or mental disabilities (2)
- Spaces for 3<sup>rd</sup> sector – charities, voluntary and not-for-profit organisations (2)
- Care facilities and extra-care facilities (2)
- Public seating (2)
- LGBTQ+ safe spaces (1)
- Sheltered housing (1)

Port of London noted that the definition of *sports facilities* currently includes "*playing fields, leisure centres, swimming pools, gyms and small fitness studios and the like*" and suggested adding *river-based recreational facilities* as part of this definition.

GLA noted that the current five broad categories that fall under social and community use fail to capture the wide variety of cultural facilities existing in the borough. GLA highlighted that these facilities make an enormous contribution to London's culture, heritage and tourism and should be promoted in accordance with Policy HC5 of the London Plan.

### Issue 2: The protection of social and community uses

**Q 8.2: Should there be any circumstances (outside the freedoms allowed by the Government's new regulations) when the Council should allow the loss of a social and community use?**

Comments from 22 stakeholders were received.

3 comments received were of strong opinion that under no circumstances should the loss of a social and community use be allowed. 2 respondents

noted that the current sequential approach in Policy CK1(c) provides appropriate tests for the consideration of social and community uses.

A number of comments were made outlining a variety of acceptable circumstances, which can be categorised as follows:

- The reuse of land for alternative uses can be allowed if it is demonstrated by the evidence that existing social and community uses are no longer required or in surplus and that the relevant community has access to an alternative facility. This could include a test of vacancy, where no end user has been forthcoming through active marketing for a set period (7)
- If the development proposes re-use of the land for the same, similar or related use of better or at least equivalent quality, quantity and accessibility (5)
- If the benefits of the proposed new use when considering overall planning balance significantly and demonstrably outweigh the harms caused by the loss of community and social use (4)

Additionally, concerns were raised (2) regarding the recent changes to the Use Classes Order and the inclusion of former D1 and D2 uses into the newly formed Class E. The respondents felt that these changes reduce the Council's ability to protect social and community uses.

### **Issue 3: The need for new social and community uses**

#### **Q 8.3: Are you aware of the lack of any particular facilities in your area?**

Comments from 25 stakeholders were received. The comments mentioned the need for the following facilities.

#### **Borough wide:**

- Adequate space for primary care, eg medical centres with clinics for specific conditions
- Community spaces or meeting rooms catering for large meetings
- Gyms
- Good quality child play areas
- Pedestrianised areas that link neighbourhoods with no cycle access either, walkable neighbourhoods
- LGBTQ+ safe spaces
- Premises for voluntary sector organisations

#### **Earl's Court:**

- Community space or meeting rooms (2)

- Gym and swimming pool (2)
- Mobility classes for elderly and disabled
- Children's play space (2)
- Community tabletop-sales facilities for recycling household goods and furniture etc.
- A local boot fair
- Community health and wellbeing space (2)
- A day centre for the elderly
- Local medical services (GP surgeries)

**Dalgarno:**

- SQWN made a comment about the sheltered housing at 1 Nursery Lane dating from the 1970s and the need to include the building within a programme for major refurbishment or rebuild.

**Chelsea Riverside:**

- A community meeting room
- The Kayaking London centre at Lots Road

**Latimer:**

- Improved access to public transport (2)

**Courtfield:**

- Public toilets

The Hillgate Village Residents' Association together with the Pembridge Association and Campden Hill Residents' Association (CHRA) provided a detailed comment on the lack of larger community spaces and affordable places for public meetings and community events in Pembridge and Colville wards. It was also noted that as the area becomes more expensive, some facilities that were formerly available either closed their doors or became too expensive and out of reach for many residents for hire. As the solution to this issue, the comments recommended considering the shared spaces model to new development, with upper floors and entrance areas of a new office or residential developments available for affordable public use. The comments noted that these spaces would benefit from flexible arrangements to ensure a range of facilities can be provided depending on the local needs. There were two examples of such approach mentioned: Westbourne Grove Baptist Church complex which combines a range of voluntary and cultural activities with for-profit commercial space rental, and The Reed Building in Convent Gardens which is a multi-generational community centre.

Kensington Society welcomed and supported the need for the Social and Community Uses Audit. The Society also expressed concerns about the lack of community meeting places, affordable care homes and insufficient provision of high-quality child play areas as well as schools. The comment also highlighted the importance of strategic planning to ensure a better distribution of health centres and post offices in the borough. The Society has noted that to ensure the proper provision, distribution and easy access of community facilities there is a need to put a bigger emphasis on maintaining and recreating walkable neighbourhoods and further strengthen the policy on walkability.

## 9. Transport

### Issue 1: Increasing active travel

#### **Q 9.1: How should new development support modal shift from private car travel to walking and cycling?**

38 stakeholder responses were received. All of which were supportive of a modal shift from private car travel to walking and cycling. The following suggestions were made to encourage and support that shift:

- Support for a 'car free' new development policy.
- Suggest setting a one car per housing unit limit or limited parking permits per resident.
- Encourage use of electric vehicles and support provision of EV charging infrastructure.
- Encourage cycling and support provision of cycle infrastructure – cycle lanes, parking and storage.
- Remove barriers and hazards to walking and cycling in the Borough – such as uneven pavement, overly narrow streets etc.
- Encourage walking and support walking by ensuring pedestrian paths, pavements and crossings are provided and made safe.
- Provision of joined up green spaces and pathways for walking and cycling.
- Increase priority for walkers and cyclists on roads.
- As well as walking and cycling public transport systems should be supported and use encouraged. High trip generating developments need to be located in areas with strong public transport infrastructure and capacity.
- Pedestrianisation of suitable areas in the Borough.
- Port of London Authority raised that use of and access to the Thames pathways and Grand Union Canals should be protected and encouraged.
- A number of respondents including Sport England encouraged that the new Local Plan apply the London Plan healthy streets approach – new development should seek and consider opportunities to improve walking and cycling facilities and connections in the Local area.
- Raised that a Borough wide strategy needs to be considered ensuring that walking cycling facilities provided by new development link up and are connected to the wider area.
- A number of RAs including the Hillgate Village Resident Association suggested that the use of private vehicles in the Borough is linked to planning of retail centres in the Borough and nearby area. Many

personal car journeys are made to get to retail centres such as Westfield. Walkable neighbourhoods with well-planned retail need to be a priority in order to reduce the use of private cars and encourage walking and cycling.

- Also suggest providing support for local markets and forms of retail that people walk and cycle to.
- TfL highlight that active travel objectives in the new Local Plan should be consistent with our blue-green futures objectives.

The following comments were also raised:

- Support for active modes of transportation but raised that people such as skilled workers require a private car and there should be provision for that as well.
- Concern that a significant portion of the Borough population do not want to cycle. For example, the elderly, infirm, disabled. Therefore, warn against focusing on cycling too much.
- Raised that the needs of walkers and cyclists are often at odds and that dedicated cycle lanes can be intimidating for pedestrians. Suggest making pedestrians the top priority.

## Issue 2: Traffic congestion

### **Q 9.2: Under what circumstances is off-street parking in new developments acceptable?**

30 comments were received from stakeholders. These can be summarised as follows:

- Many argued that no parking should be provided with new development and that they should be permit free.
- Some argued that there should only be parking provision for electric vehicles.
- Others argued that there should be limited parking provision for disabled, elderly and vulnerable residents and that their use of cars and parking rights should be protected.
- Equally many argued that off-street parking should be considered acceptable in all circumstances until cars are no longer sold or used.
- TfL raised the importance of consolidation of servicing and deliveries.
- A number of respondents included RAs suggested new development include parking provision underground.

### Issue 3: Pollution

**Q 9.3: Should the Council ensure that new developments give the strongest incentive to residents and businesses that use them to avoid using petrol or diesel vehicles?**

25 comments were received, the vast majority of which supported ensuring new development is given incentive to residents and businesses that use to avoid using petrol and diesel vehicles. Stakeholders made the following suggestions in order to do so:

- Support for basing cost of resident parking permits on emissions.
- Suggest supporting a car free approach to new development.
- Suggest use of travel plans for new developments to deliver this.
- A number of respondents highlighted the importance of getting this right at major new development sites such as Earl's Court.
- Suggest supporting provision of EV charging infrastructure.
- Suggest supporting provision of cycle infrastructure.
- Suggest supporting good public transport capacity and links.
- Suggest supporting development near existing public transport facilities.
- Suggest supporting improvement and enhancement of the public realm to encourage walking and cycling.
- Some stakeholders raised that they would require more information as to what the 'strongest incentives' the Council proposes are to answer this question.

In addition, stakeholders raised that:

- Lack of proper road and infrastructure maintenance is the cause of significant pollution in the Borough – for example a lack of a joined approach to bridge maintenance has caused multiple bridges to be unusable at the same time causing significant congestion.

### Issue 4: Improving access to public transport

**Q 9.4: What should be the Council's priorities in seeking new development-funded transport infrastructure?**

31 stakeholders provided comments in which the following were suggested as priorities for the Council when seeking new development-funded transport infrastructure:

- Bus network infrastructure including – more buses, better North-South bus connections, electric buses, extra seats at bus stops, count down screens at shelters.

- Additional overground station at the West London Line - Westway Circus and North Pole Road – suggested by St Quintin and Woodlands Neighbourhood Forum
- New Elizabeth Line station at Kensal Road.
- Provide step-free access to existing underground stations.
- Pedestrian underpass between Imperial West at White City and Latimer Road.
- Maintain and enhance existing public transport.
- Improve cycle connections from Imperial's South Kensington Campus to White City via Holland Park Avenue and Notting Hill Gate and to support improvements to Latimer Road.
- Support improvements to public realm and support walking and cycle in line with the London Plan healthy streets approach.
- Improvements to West Brompton, West Kensington and Earl's Court stations (step free access from the site) to reduce the pressure at the stations.
- Woodland Trust suggest ensuring new transport infrastructure is required to deliver environmental net gain like other development.
- Focus on delivering public transport infrastructure in areas of the Borough where transport links are poor such as Golborne, Dalgamo and North Kensington.
- Building an underpass between Oxford Gardens and the Imperial development.
- Working to reduce traffic congestion across the Borough.
- TfL welcome a focus on step free access and improvement to active transport infrastructure. However, they warn that delivery of a new underground station in North Kensington is not a priority and they do not support plans for a new West London line station at Westway Circus. They also highlight the importance of securing land for transport infrastructure.



## 10. Streets, Parks and Outdoor Spaces

### Issue 1: Parks and play space

**Q 10.1: Do you feel there are enough places within the Borough that children can play formally or informally? What form would you like to see these take?**

Comments from 27 stakeholders were received.

5 of the comments received explicitly stated that the existing supply of children's play facilities within the borough is insufficient. Other 5 consultees highlighted that although there are some great playgrounds and opportunities to play for children, there are multiple issues regarding the existing provision:

- Not all spaces are accessible to ensure disabled children are included;
- Even where play spaces are provided as part of major developments, they are too often too small, disassociated from the development, not safe and therefore they are not used so much as anticipated;
- Valuable social and play space is often taken up by vegetable planters, which are not always used or stand abandoned;
- Existing open spaces are becoming increasingly oversubscribed as more and more new developments inside and outside of the borough do not provide new green spaces and instead rely on the existing provision, with the situation further exacerbated by the heavier use of parks during the lockdown.

In response to what form should new play spaces take, green spaces with designated play areas (4) and MUGAs (3) were mentioned the most. 3 consultees noted that the creation of Play Streets by closing some streets to traffic and adding up greenery is a great opportunity to provide more informal play areas for children. Other forms of play spaces were each mentioned once: School Streets, temporary parks as part of larger multiphase developments and small gardens with benches. 2 comments were place-specific, mentioning the land underneath the M40 as the opportunity area for creating meaningful open green space.

4 consultees questioned the emphasis on the provision of play spaces for children, noting that the Council should rather provide recreation spaces for all ages and abilities. 2 comments received were particularly concerned with the provision for the elderly, highlighting the need for safe spaces, outside adult gyms, dementia-friendly spaces etc.

TfL highlighted that design and management of streets and the public realm are of the same importance as the provision of parks and play spaces, referencing the Healthy Streets approach as a tool to achieve the Mayor's Vision Zero objective.

## 11. Conservation and Design

### Issue 1: Building heights

**Q 11.1: Could tall buildings be located on less sensitive locations in townscape terms to help meet our housing targets? If so, do you have any views on potential locations for taller buildings?**

33 comments were received from stakeholders. These were equally split between those supportive of taller buildings and those not supportive of taller buildings. Comments can be summarised as follows:

- Supportive of tall buildings in order to deliver the housing needed in the Borough and supportive of the Council taking a design and townscape approach to identifying suitable sites for taller buildings.
- Not supportive of tall buildings, suggesting that it is not appropriate in RBKC and indicating their belief that it is not appropriate in a post-Grenfell and post-covid world.
- RAs suggested that the Council should deliver high density development in other models rather than tall buildings and that there should be a maximum limit on building heights.
- A number of respondents suggested that high density medium rise development is more appropriate in the Borough.

Potential locations for taller buildings identified by stakeholders are as follows:

- Locations near existing public transport facilities – as tall buildings are high trip generating developments.
- North of the Wornington Green estate (at the apex of Wornington Road with Portobello).
- West side of the Southern end of Latimer road
- Earls Court and Kensal Canalside opportunity areas.

**Q 11.2: Should we develop more detailed assessment criteria for taller buildings?**

34 comments were received from stakeholders. Comments can be summarised as follows:

- Many respondents reiterated that they were not supportive of taller buildings in the Borough and that there should be a height limit of 8 or 10 storeys on new development.

- A number of respondents suggested that the main criterion should be ask local people if they want/need tall buildings.
- Most were supportive of a good design quality led assessment criterion.
- Others identified the impact tall buildings can have on views and suggested that be part of the assessment criterion.
- Historic England suggested that a set of development principles should be developed for certain locations informed by a character study and building heights study to use as assessment criteria.
- A number of respondents also suggested ecology, light, environmental impacts etc. should be part of a detailed assessment criteria.

## Issue 2: Design quality, character and growth

### **Q 11.3: Do you have any views on the approach that the existing design policy should be expanded to secure high quality and exemplary development?**

35 stakeholder responses were received. These can be summarised as follows:

- A number of respondents suggested prescribing architectural design and styles.
- Respondents referred to the Planning White Paper and national design code, expressing concern over nationally set development management policies rather than using Local Plan policy.
- Similarly, respondents identified that the Council will need to develop design codes if the White Paper proposals are made into law and were supportive of this.
- Suggested that a wider area around designated conservation areas should be considered.
- Sports England suggested applying their active design principles.
- Equally some respondents stated that the existing Local Plan 2019 design policies.
- Others suggested that green spaces, parks gardens and trees should be included within the Council's design policy.
- Respondents also highlighted that local residents should be consulted in order to understand what high quality and exemplary development means in different locations around the Borough.
- Some expressed concern about the impact on conservation areas and the Borough's heritage assets as design and the idea of beauty is very subjective.
- A few comments expressed concern about expanding the existing design policies suggesting that it may overly prescriptive and lead to homogenous development.

Additionally, the St Quintin and Woodlands Neighbourhood Forum expressed their concern about the OPDC redevelopment of the North Pole East railway yards.

A number of respondents also suggested that new Local Plan policies should address heritage assets at risk within the Borough.

## 12. Integrated Impact Assessment

**Q 12.4: Do you have any comments on the above objectives or know of any further objectives that should be considered?**

12 responses from stakeholders were received. These summarised below:

- TfL suggested the list of objectives be extended to include traffic reduction and mode shift in line with the London Plan.
- RAs expressed a desire to work closely with the Council on developing the IIA objectives.
- The Woodland Trust highlighted the importance of environmental objectives especially in a post-covid recovery.
- Many respondents highlighted the importance of community involvement and consultation.
- Respondents highlighted the importance of sustainability criteria and objectives especially in a post covid recovery.
- Finally, a number of respondents highlighted that high rise buildings need to be recognised as a danger, especially since the Grenfell Towers tragedy. The IIA should include this.