

- the large-scale, total loss of educational use from this site, which has been in educational use for over 150 years;
- the proposal is completely contrary to development plan policies that seek to protect and enhance the supply of land and buildings in social and community uses and specifically seek to retain educational uses (Local Plan Policy CK1 and London Plan (2016) Policy 3.18);
- the Council has misinterpreted the basis of Policy CK1, which seeks to protect low land value social and community uses from being developed for high land value residential uses, by failing to understand the basis of policy and encouraging a use – a luxury retirement extra-care housing scheme - which is not the “same or similar use”, not another “social and community use” nor an enabling use. There is no policy basis for any housing on this site;
- the scheme does not meet any of the key tests for social and community uses in Policy CK1;
- the scale of the scheme: the development of a major raft over the railway, considerably raises the quantity of development, the scale of the works and the length and impact of the construction project;
- the housing mix is totally inappropriate: there is no shortage of luxury housing, but there is a shortage of affordable housing for older people, especially care homes;
- there is no housing need to justify this scale of provision of luxury retirement extra care housing, whilst the proposed development provides no significant contribution of affordable housing nor, what most people would regard, as an affordable care home;
- there are few public benefits that are directly linked to this scheme to offset the harm, other than access to the existing garden; and
- the Construction Traffic Management Plan is unacceptable.

1. Loss of educational use:

The Borough has lost a succession of large educational sites – all to luxury housing schemes – especially King’s College sites in Chelsea (College of St Mark and St John) and Kensington (Queen Elizabeth College), all before the Council’s Local Plan introduced Policy CK1 in 2010. The South Site of Holland Park School on the other hand was justified as enabling development for the rebuilding of the school.

This site has been in education use for more than 150 years. The proposal would expunge all educational use from this site including the loss of a 109-bedroom hall of residence. Both the loss of education and the hall of residence should be counted as losses, the latter as a housing loss to be offset against any gains when assessing the net change in housing.

This is specifically contrary to London Plan (2016) Policy 3.16.

2. Loss of social and community use

This scheme would see the loss of educational use, student housing, a large hall and a nursery school – all social and community uses described in para 30.3.4 of the Local Plan (2010/2015). Since Policy CK1 was designed to protect low value, social and community uses, their removal and replacement by high-value luxury retirement housing cannot be used to “compensate” for the loss of social and community uses.

This is specifically contrary to Local Plan Policy CK1.

3. Misinterpretation of Local Plan Policy, London Plan Policy and national policy

The Local Plan (2015) is very clear about the purpose of Policy CK1: Keeping Life Local and how it should be applied.

The purpose of the policy is very clear:

- to protect and promote functions that otherwise might be lost to residential use and ensure that necessary infrastructure is provided to support the scale, location and timing of development planned for an area. (para 30.1.1)
- to protect the uses that have lower land values, but high value to the community. (para 30.2.1)
- with high residential property values, social and community uses and other local services are being threatened in Kensington and Chelsea as they have a lower land value than other uses, in particular