

## 7. Lack of need for this scale of specialist housing in the borough

There is not this scale of need for “extra-care housing”, let alone for such a luxury, niche housing market in Kensington and Chelsea. The Strategic Housing Market Assessment (2015) indicates that there is a need for 17 units/year of all types of extra-care housing to meet the needs of this borough, yet for this segment of the market it would require only a fraction of this – the Dovehouse Green scheme with 55 units could only attract 10 deposits. This scheme would add a further 142 units. This would mean that most of these flats would be meeting the need for this specialist product from a very wide catchment, including overseas markets. It would be difficult both to justify this scheme as “providing significant benefits to borough residents” or meeting the objectively assessed needs for housing in this borough. The real need for housing for older people is for more traditional care homes – many of which have been lost to luxury housing – such as Vicarage Gate and Delves House in Queen’s Gate Terrace.

## 8. Public Benefits:

This is now, following the removal of elements in the earlier withdrawn application, entirely a housing scheme. The only social and community use – the “community hall” - at 125sqm is less than a third of the size of the current hall (380sqm).

The housing mix of one and two-bedroom flats is appropriate for retirement housing, but the luxury nature of the flats and the associated facilities are purely for the benefit of future residents from a wide catchment and are of little public benefit, especially if the benefits are not meeting the housing needs of older residents of Kensington and Chelsea. The loss of the 109-bedroom hall of residence would need to be offset against any increase in housing units.

Access to the gardens, which up until now has been limited, is a public benefit, although it is limited as the access arrangements are limited by the lack of an open- air entrance from Kensington Square. This would deter people from entering

The “suggested” financial contribution to a potential step-free access scheme to High Street Kensington Station is

- neither necessary as a result of, nor directly associated with this scheme,
- not proportionate;
- appears as an unrelated donation, which does nothing to mitigate the harm caused by the scheme;
- is not necessary for the consent, nor directly related to the scheme nor does it mitigate the harm caused by the scheme; and, in addition,
- entirely speculative and may never happen. It looks like a purely financial inducement and should be entirely discounted. The key issue is whether or not planning permission should be given even if this inducement were not offered.

The amount of use of the underground generated by this development would be a major reduction compared to its use as a college, due to the reduction in the overall numbers of people and trips generated and the much lower propensity to use the underground. In any case, access to the station via Kensington Square would be sufficiently close. The financial contribution has nothing to do with mitigating the impact of the development.

## 9. Construction Traffic Management Plan

VRARA will be commenting separately on this issue, but would flag up that:

- the access to this site is highly constrained, with all construction traffic proposed to access the site via South End
- the access route is over 600m on quiet, narrow residential roads; We strongly object

to:

- any holding area with the Victoria Road area – it should, as it was for the De Vere Gardens development (aka One Kensington Road), be east of Palace Gate on the south side of Kensington Road;
- the creation of a one-way system at the top of Victoria Road and Prince of Wales Terrace is not acceptable; and
- all construction traffic being directed to South End - any construction traffic related to developments on the Kensington Square frontage should be serviced from Kensington Square.

Summary:

The Victoria Road Area Residents’ Association objects to this proposal, because: