

**The Royal Borough of
Kensington and Chelsea
Local Development Framework**

**Planning Policy Issues and
Options
November 2005**

**PREPARING A NEW PLAN
FOR YOUR BOROUGH**



Introduction

This document seeks your views on key issues for planning in the borough and on the options available for addressing them.

The borough is one of the smaller London boroughs in terms of area and population but because of its history and position close to the centre of London it is the location for a wide variety of activities. It is one of London's most attractive and desirable residential areas with the highest residential land values in the country.

The quality of the borough's built environment is reflected in the fact that nearly three quarters of its area is designated as conservation areas. An historic area of London, the borough plays host to a number of international attractions and institutions - such as the major shopping streets of Knightsbridge, King's Road, Kensington High Street and Portobello Road, the Earl's Court Exhibition Centre, the South Kensington Museums and Kensington Palace.

While the borough has the highest average income in Great Britain, it is not without social and other problems. Two wards in the north of the borough are amongst the most deprived in the country. The borough has the highest population density in England and Wales yet the least publicly accessible open space of any London borough. The borough has a very high turnover of population, with one-fifth of its residents having had a different address in the previous year.

The demand for homes and businesses means that the borough is set to continue to grow in the future and the challenge is to ensure that future growth is managed in a sustainable way. We need to plan for the future and make provision for homes, jobs and community facilities, while at the same time protecting and improving our environment.

The Unitary Development Plan (UDP) plays an important role in this process, setting out policies which guide new development. However, new Government legislation means that the UDP needs to be replaced by what are known as Development Plan Documents which will be part of a suite of documents known as the **Local Development Framework (LDF)**.

The New Local Development Framework

The main differences between the UDP and the LDF can be summarised as:

Content

The LDF can cover a broader range of issues than the UDP and has to take account of other relevant strategies, in particular the Community Strategy;

Process

The Government has laid down new rules and procedures for the preparation of documents which have to be followed, with increased emphasis on public consultation throughout the process; and

Form

Instead of being produced in one document, the LDF will consist of a portfolio of documents. This is intended to make it easier to update separate parts of the plan as they become outdated. **Development Plan Documents** (DPDs) will contain the main policies and **Supplementary Planning Documents** (SPDs) will add detail to them.

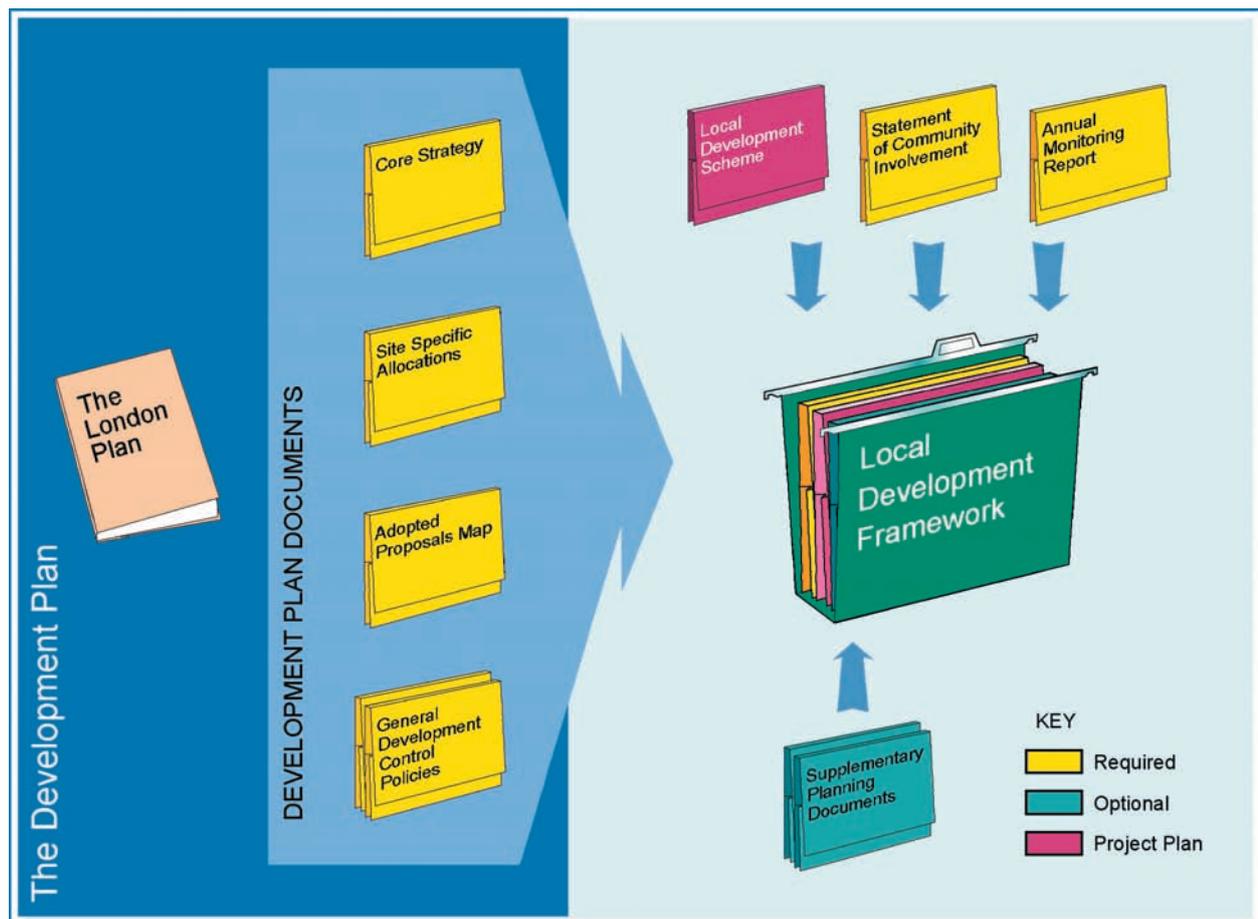


Illustration based on figure taken from Government guidance

'PPS12 Local Development Frameworks'

This Issues and Options Paper is your first chance to influence the direction that the new LDF will take. The Issues and Options Paper relates to the Core Strategy and General Development Control Policies Development Plan Documents. At this stage, as we seek your views, the issues and options are discussed in general terms (and there may be others that you wish to raise). They will become more focused as the documents are taken forward and there will be further opportunities for comment at later stages.

It is important to note that this paper does not deal specifically with future allocations of land or specific sites. The Council is producing a separate DPD on this and is consulting with landowners, developers and agents asking them to identify potential development sites and how they would wish to see them used. **These proposals will be the subject of consultation at the next stage of the process and you will be able to express your views on them.** In the meantime, if you know of any potential development sites and have views on how they should be used, please use this Issues and Options consultation to let the Council know about them.

The Council is developing an evidence base to inform future policy. If you would like to know more about this, please get in touch with us using the contact details at the end of this section.

Have Your Say

The purpose of this consultation is to focus on options that are available to the Council in attempting to plan for growth over the coming years. **To be clear from the outset, you should be aware that in some cases the options open to the Council are limited as we have to follow the policy guidance of others:**

- We must have regard to national Planning Policy Statements, which set out the Government's planning policies on a variety of land uses such as housing, town centres, employment etc;
- We must be in general conformity with the Mayor of London's spatial development strategy - the 'London Plan';
- We must have regard to other plans and strategies produced by the Council and local partnerships, in particular the Kensington and Chelsea Partnership's 'Community Strategy'.

How to Respond

This Issues and Options Paper sets out local planning issues facing the borough and some options for resolving them. In order to set out the context for you, each of the issues refers briefly to the national and London wide policy background.

An 'Options Response Form' is provided with this paper, to be read in conjunction with it. For each issue raised, you may simply respond **by ticking the appropriate box alongside the option (or options, there may be more than one) that most closely represent your views**. You are encouraged to add more options if you wish in an 'other options' box (please do not be constrained by the size of the box, expand your response on separate sheets of paper as you feel necessary). You are also asked to raise additional issues if you feel that they are not adequately covered already, with proposals for addressing them.

The Council wishes to encourage as large a response as possible - please inform your neighbours, colleagues or other contacts about this paper and get them to respond too. Both the paper and the Options Response form can be obtained from the Council's website.

When you have completed your response forms, please send them, by **Friday, 23 December** to:

**The Executive Director, Planning and Conservation
f.a.o. The Policy Team
Royal Borough of Kensington and Chelsea,
The Town Hall, Hornton Street,
London, W8 7NX**

If you have any queries or comments, contact the Planning Policy Team by writing to the above address or:

- e-mail:
PlanningPolicy@rbkc.gov.uk
- Phone the dedicated Local Development Framework 'hotline':
020 7361 3879

More details about the Local Development Framework can be found on the Council's website at www.rbkc.gov.uk/planning.

Key Facts about Kensington and Chelsea

The borough has a very diverse community and the range of planning issues identified in this paper does not apply equally in all areas. The Key Facts give an indication of what the borough is like.

Area

- 12.4 square kilometres (4.8 square miles)

Population

- 184,000 (2004)
- Increase by 12.9% 1991 to 2001
- Expected to grow to 196,000 by 2006

Age and Gender

- 48% male, 52% female
- More males than females up to age 16
- More females than males over age 43
- Around twice as many females than males over age 90
- Higher than average proportion of population over 65 and over 85
- Change in population 75+ (2003-2009): +5%

Household size

- 1991 = 1.80 people per household
- 2001 = 2.01 people per household

Population

- 131 residents per hectare (highest density of population in Britain)

Ethnicity

- 21% black and minority ethnic population
- Highest proportion from BME groups: 44% in Golborne Road

Deprivation

- Not especially deprived by national or London standards, but varies across the borough
- Most deprived: Golborne Road, within the 4% most deprived 'small areas' in England
- Least deprived: Cadogan Square, within the 14% least deprived 'small areas' in England

Average House Prices (September 2004)

- Detached = £6,350,000
- Semi-detached = £2,762,389
- Terraced = £1,431,392
- Flat / maisonette £171,628

Tenure

- Owner occupied=44%
- Public rented=26%
- Private and other rented=30%

Car ownership

- Households with at least 1 car =50%
- Households with no car=50%

Education

- 37 state schools with 10,946 pupils (January 2004)

Health

- Death rates amongst population below 75 years of age is below average
- Male life expectancy = 79.8 (England average 76.2)
- Female life expectancy 84.8 (highest in UK. England average 80.72)

Crime

- Rates below London average except for burglary and theft from cars
- Most crime relates to cars and property rather than violence against the person

Employment

- Diverse economy: office (21% publishing and media), retail (18%), hotels (8%)
- Average gross weekly earnings = £701.79 (2002, highest in Great Britain)
- Unemployment = 2.1%, June 2005 (Great Britain = 2.3%)

The Core Strategy Development Plan Document

ESTABLISHING THE VISION AND OBJECTIVES FOR THE CORE STRATEGY

We would like your help in setting the Core Strategy's vision and objectives. The Core Strategy will set out the key elements of the planning framework for the borough including a spatial vision and strategic objectives. The Council's vision for Kensington and Chelsea is to build 'a Better City Life'.

The Core Strategy must relate to the Kensington and Chelsea Partnership's "Community Strategy" which was published on November 3rd, 2005. This was prepared to promote the economic, social and well-being of communities in the borough and to contribute to the achievement of sustainable development.

The Community Strategy says that life in the borough is most likely to be improved when local people and the organisations that serve them agree:

- What they want to achieve;
- Who is going to do what;
- What they will work on together;
- How these efforts will be supported; and
- How success will be measured.

The Community Strategy therefore identifies a set of long-term goals along with specific aims and objectives that will help organisations and individuals to work towards these goals. The Local Development Framework (LDF) is intended to give spatial expression to those elements of The Community Strategy that relate to land use and development. As such, it will become a key method of implementing the Community Strategy and so it is essential that the two strategies complement each other.

Issue 1: How can we Achieve the Vision of "a Better City Life" ?

You will need to consider such questions as what it is that you like about the borough that makes you want to live here and what would you not want to see changed; by considering these sorts of questions you can assist us in framing the objectives for the Core Strategy.

We have set out a number of options for draft objectives for the Core Strategy which both complement the Community Strategy and would help to build 'a Better City Life'. We would welcome your comments on them and suggestions for others.

Go to Issue 1 on the Options Response Form

General Development Control Policies Development Plan Document

While this section of the paper addresses the issues and options that will influence the future direction of the General Development Control Policies Development Plan Document, your responses will also be used to inform the development of the Core Strategy.

CONSERVATION AND DEVELOPMENT

The National Policy Approach to Conservation and Development

Government guidance states policies on producing good design should avoid unnecessary prescription or detail and should concentrate on guiding development in the broader sense. For example, policies relating to tall buildings should concentrate on guiding the overall height in relation to neighbouring buildings and the local area. Special attention should be given to the desirability of preserving or enhancing the character and appearance of conservation areas and listed buildings. In particular special regard should be had for such matters as scale, height, form, massing and respect for traditional patterns of frontages.

The Regional Policy Approach to Conservation and Development

The London Plan states that very high standards of design are needed to make London a better city to live in and more attractive. Excellence in design can also make higher densities a source of better, more varied and more sustainable environments in places of high accessibility and thereby reduce the need to travel. Tall buildings are promoted where they create attractive landmarks, a coherent location for clusters of economic activities or act as a catalyst for regeneration. It is recognised that tall buildings must be acceptable in terms of design and impact on their surroundings.

The London Plan also encourages boroughs to identify areas, spaces and buildings of special quality or character and adopt policies for their protection and enhancement taking into account the strategic London context. Careful consideration should also be given to the relationship between new development and the historic environment of London's built heritage.

Local Context

The borough's unique residential character is a major contributor to London's diversity and vitality. A large part of the borough derives its character and townscape from its heritage of eighteenth, nineteenth and early twentieth century buildings. The Council has designated 36 conservation areas, some centred on the major estates and on the many garden squares. Encompassing over 70% of the borough, these conservation areas vary in character and their appeal often depends on subtle aspects of the local scene. The borough contains some 4,000 buildings, which are listed for their special architectural or historic interest.

Issue 2: Recognising the Importance of the Borough's Heritage and Environmental Quality

In setting out to prepare the LDF we are not starting from scratch. The conservation and development policies in the UDP are intended to ensure the provision of an environment which can satisfy the needs of modern life whilst maintaining its quality and heritage value. They also seek to allow change to occur, but in a sensitive way. In order to achieve this, the Council has relied on detailed policies to ensure that all new development contributes to the enhancement of environmental quality. The policies have been developed and used over a long period of time with the support of the community. There is now increasing pressure for more intense development in the borough.

[Go to Issue 2 on the Options Response Form](#)

Issue 3: Large Scale, Landmark Buildings

The borough's townscape and historic character is reflected within its skylines, views and vistas. The majority of locally important views are not designated in the London Plan and will therefore require protection in the LDF. The London Plan promotes the provision of large scale, landmark buildings within all London boroughs. The UDP seeks to preserve existing skylines, views and vistas and resists new tall buildings which would significantly exceed the height of neighbouring buildings. The London Plan suggests that local authorities may wish to identify areas of 'specific character', which would be sensitive to the provision of tall buildings, and that elsewhere proposals should be judged against specified criteria. Conservation areas in the borough could be assessed to be sensitive, but this could leave other areas under greater pressure for tall buildings.

[Go to Issue 3 on the Options Response Form](#)

Issue 4: Loss of Front Gardens

The Council recognises that front gardens contribute to the borough's residential character, improving both visual amenity and streetscape, and the UDP generally resists their loss to off-street parking. Losing front gardens to hard surfacing, either for car parking or convenience, can increase the apparent width of the road, lead to the loss of on street parking spaces and have unintended consequences; accidents involving vehicles emerging or reversing from private drives, insufficient drainage and effects on the microclimate of an area. Powers are now available to stop unauthorised pavement cross-overs.

[Go to Issue 4 on the Options Response Form](#)



Issue 5: Telecommunications Equipment

Mobile phones are extremely popular and nearly everyone has one. But proposals to construct and install the equipment required to make the systems work are often unpopular for a variety of reasons - concerns about potential adverse impact on health, increased street clutter and the like. As technology develops, these problems may be addressed, for example providers are now suggesting locating equipment on the top of lamp columns to provide an evenly spaced network of lower power installations. The existing UDP, where possible, seeks to minimise the impact of telecommunication development. Unfortunately, proposals for the installation of telecommunication equipment are not always subject to planning control.

[Go to Issue 5 on the Options Response Form](#)

Issue 6: Subterranean Development

A shortage of development land and high land values have resulted in increasing pressure to build new large extensions to properties underground. The last three years have seen a substantial rise in applications involving subterranean extensions of various sizes for a variety of purposes. The UDP seeks to resist subterranean development in certain circumstances. Concerns are frequently raised by neighbours about the excessive disturbance that these excavation operations cause, the impact on the structural stability of neighbouring properties, the future limitations on

planting and the effect on the water table. Should the LDF continue to resist this kind of development or should there be more flexibility to assist people to continue to live in the Borough, and expand their homes and adapt them to changing needs?

Go to Issue 6 on the Options Response Form

Issue 7: Extensions to Residential Properties

The Census shows us that families with children are a sizeable proportion of the households leaving the borough. One of the reasons may be the lack of opportunity for them to extend their homes to create more living space. However, buildings in the borough are frequently difficult to extend without offending the light, privacy and outlook of adjoining buildings. Residents' appreciation and enjoyment of the special character and appearance of conservation areas derives from both public viewpoints and views from within their dwellings. This needs to be balanced against the wish of residents to extend their homes.

Go to Issue 7 on the Options Response Form

HOUSING

The National Policy Approach to Housing

Government policy aims to create 'sustainable communities' that offer a wide range of housing for all social groups, including those requiring affordable and special needs housing. The Government does not consider that different types of housing and tenures make bad neighbours and Councils are encouraged to develop 'mixed and balanced' communities. Councils are also encouraged to provide an appropriate mix of housing in terms of the size and type of accommodation. Priority should be given to re-using previously developed land, bringing empty homes back into use and converting surplus non-residential buildings into residential use.

The Government promotes the provision of affordable housing and normally requires inner London boroughs such as the Royal Borough to seek affordable housing where development proposals include 15 or more dwellings or where a residential site is more than half a hectare in size. Affordable housing is housing made available with some level of subsidy, for those who cannot afford a home on the open market, whether for rent or to buy. Recently the Government has supported the provision of a form of affordable housing referred to as 'intermediate housing'. Intermediate housing schemes enable people to occupy residential property on the open market which they would not have previously been able to do. This form of housing includes shared ownership schemes (part rent/part mortgage) and key worker¹ housing.

¹ Key worker housing is housing available to employees working in a number of specified public sector fields, funded by the Government. Amongst those eligible for this type of housing are nurses, teachers and police earning below a certain threshold (£40,000 as at October 2003). The scheme involves the provision of equity 'homebuy' loans, shared ownership of newly built properties and 'intermediate renting' at subsidised levels. Ownership arrangements are strictly controlled.

The Regional Approach to Housing: The London Plan

London is experiencing significant population growth and consequently there is a high demand for housing. In order to meet this demand the London Plan includes a London-wide target for 30,000 additional homes per year from all sources. The London Plan says that the Council needs to find a minimum of 10,800 new homes over the period between 1997 and 2016 (this averages 540 dwellings per year) - and boroughs are encouraged to exceed these targets. However, the Mayor of London has published draft Alterations to the London Plan and, recognising the borough's heritage constraints and more limited opportunities for development, is proposing that between 2007/2008 and 2016/2017 the annual target should be reduced to 350 new dwellings.

The London Plan echoes national guidance by encouraging boroughs to develop policies to support mixed communities. It includes a matrix which sets out residential density ranges which boroughs are expected to adopt in their LDFs. The London Plan also includes a London-wide strategic target that 50% of all new housing should be affordable. Due to differences in land values throughout London it is recognised that there will be some variation between the boroughs in terms of the provision of affordable housing, with some boroughs being better placed to achieve the overall 50% target (this in theory allows some boroughs to have a higher, and others a lower, target).

Boroughs are encouraged to seek affordable housing in schemes with less than 15 housing units, where this can be justified. When seeking affordable housing, boroughs are advised to seek 70 % social rent accommodation and 30% intermediate housing.

Local Context

The Council's policies aim to protect the existing housing stock, provide and retain a range of housing types and sizes and to maintain and increase the amount of affordable housing, family dwellings, small units and accommodation for special needs.

Issue 8: Protecting the Existing Housing Stock

It is important that an appropriate range of housing is provided to meet the needs of the local community. In order to maintain the residential character of the borough and the number of homes within it, UDP policies seek to protect the existing dwelling stock from change to other uses and to retain a wide range of housing types and sizes. This is in line with national and regional policy guidance and is generally supported.

There have been a number applications seeking 'de-conversion', where premises converted into flats are turned back into single family houses or to fewer, very large flats. The properties themselves remain in 'residential use' (and so there is technically no 'loss' of housing). The Council could welcome such applications, in that they provide larger dwellings suitable for family living, or it could resist them, as they result in fewer homes within the borough. Indeed the London Housing Strategy is proposing to make funding available to Registered Social Landlords (RSLs) for the de-conversion of small units to create larger 'affordable' units.

Go to Issue 8 on the Options Response Form



Issue 9: Housing Provision and Location

The demand for new homes is in part due to changing lifestyles, rather than an increase in the number of people. The average size of households has declined, but the number of households is growing. This is mainly because more people are staying single longer; more couples or families are separating; and people are living longer and continuing to live in their own home.

The borough's housing target will be met through building on sites identified for housing in the 'Site Allocations' Development Plan Document, building on 'windfall sites' (housing sites not specifically identified in the LDF, but coming forward for development over the plan period) and conversions. Between 1997 and 2004, a total of 3161 dwellings were completed in the borough - an average of 395 per annum. Options for providing new homes include building at higher densities than at present, building more smaller sized dwellings and encouraging changes of use to housing from other uses (though this might undermine other important policy objectives such as retaining businesses).

Go to Issue 9 on the Options Response Form

Issue 10: Providing Housing only for 'Local Needs'?

Demand for housing in the borough is very high. Many people from outside the borough would like to live in Kensington and Chelsea. Some properties are bought as second homes. Set against this, there is a limited land supply for new housing and little scope to radically increase the supply of housing if the special qualities of the borough are to be conserved. So, how can local people stay within the area? The more housing that is built - in all tenures - the greater is the opportunity for local people to stay here. A new approach could be to restrict the occupancy of all new housing to existing residents or those with a connection with the borough. The aim would be to resist new housing development aimed at satisfying demand from outside the borough.

Eligibility for local housing could be assessed through the development of a number of criteria, including housing need and length of time spent living in the borough.

Go to Issue 10 on the Options Response Form

Issue 11: Housing Density

The UDP's policy is to seek lower densities than in the past in order to ensure that excessive pressure is not placed on existing facilities and that the quality of the existing environment is maintained and wherever appropriate improved. This contrasts dramatically with the London Plan which sets density ranges for the borough that more than double the density sought by current UDP policy.

Parts of the borough already contain some of the highest residential densities in the country. It may be appropriate to build at higher densities in certain locations without compromising the quality of the development or having a detrimental impact

on surrounding areas, for example, higher densities may be suitable around existing mansion blocks. High quality outdoor amenity space is particularly important in high density housing developments. It provides visual benefits and is also important for passive recreation. But equally there may be parts of the borough where low density development should be retained for conservation and heritage reasons. The Council's current objectives for conservation and development seek to protect and enhance areas of character throughout the borough and to ensure that all development respects local character and is of a high standard of design.

[Go to Issue 11 on the Options Response Form](#)



Issue 12: Estate Renewal

In the lifetime of the LDF, the Council may have to renovate some of the borough's housing estates and so we need to examine different approaches as to how this could be done. One way could be to allow higher residential densities in a renewal scheme and a mix of both affordable and market housing. This would both create a mixed and balanced community while allowing for better living and design standards to be achieved. The revenue generated from the market housing would be used to pay for the replacement affordable housing (overall the number of affordable housing units would be retained).

[Go to Issue 12 on the Options Response Form](#)

Issue 13: Housing Mix

It is important to ensure that an appropriate range of housing is provided to meet the needs of the local community. The mix of accommodation in the borough should be related to the range of household types and to addressing deficiencies in the range of accommodation. The borough has the third highest proportion of single family households in England and Wales, the third lowest proportion of households with children under five in Great Britain and 11% of households leaving the borough are families with children.

The 2005 Housing Needs Study found that 41% of households in the borough occupy 2 bedroom dwellings, with 24% living in 3 bedroom dwellings. Almost half of all private rented properties are 1 bedroom dwellings and in terms of the housing

requirements of the private sector market, the greatest shortfall in terms of supply is for 3 or 4 bedroom homes (just over a fifth of households contain children).

Go to Issue 13 on the Options Response Form

Issue 14: Affordable Housing

Property prices in the borough are four times higher than the average for England and Wales and two and a half times that of Greater London. In the first quarter of 2004, the average house price in the borough was £741,145 (392% higher than the national average). The Council's 2005 Housing Needs Assessment found that the cheapest one bedroom flat cost £155,000 and that minimum rents started at £915 per month. Price rises in Kensington and Chelsea have also been above national and regional equivalents over the past five years. For a great many people, housing is therefore unaffordable. This results in various problems including people having to move from the area, greater commuting as people seek cheaper housing outside of the borough, and future economic activity may be constrained as people who would like to move into the area find they cannot afford suitable homes.

The Housing Needs Assessment provided a detailed analysis of the future requirements for affordable and market housing in the borough. It estimated that there is currently a shortfall of affordable housing in the borough of around 3,741 units per annum. This shortfall is most acute for smaller (1 and 2 bedroom) properties. However, the shortage relative to supply is greatest for 4 bedroom properties where it is estimated that only 6.7% of the need for this size of accommodation can be met. The study suggested that any target of affordable housing would be justified and that a site size threshold below the current UDP level of 15 dwellings should be considered. It is also important to retain affordable housing in the affordable housing sector so that households with the greatest level of need can continue to be accommodated.

Thresholds and Proportions

The UDP seeks a minimum proportion of one third affordable housing on sites which have a capacity for 15 dwellings or more. On those sites identified in the UDP as 'major development sites' a higher figure of up to 50% is sought. In order to create mixed and balanced communities, on-site provision of the affordable housing is normally required unless there are exceptional circumstances (in which case the developer should provide it on an alternative site within the borough). Only in exceptional cases, where both of these options are not possible, will the Council seek a payment from developers to be used to provide affordable housing elsewhere in the borough.

Table 1 below indicates the number of affordable housing units completed in 2003 and it also provides comparison data for neighbouring boroughs. In Kensington and Chelsea 203 affordable housing units were completed, which was only surpassed by the boroughs of Brent and Hammersmith and Fulham.

Table 1: Affordable Housing Completions in Kensington and Chelsea and Neighbouring Boroughs

Borough	Affordable Housing Completions, 2003
Brent	235
Camden	111
Kensington and Chelsea	203
Hammersmith & Fulham	433
Wandsworth	63
Westminster	151

Source: Greater London Authority (2005) London Plan Monitoring Report 1

Affordable Housing and Commercial Development

The Government is considering whether Councils should seek a contribution from commercial development towards affordable housing as this creates a need for workers and consequently contributes to the need for more affordable and key worker housing.

Affordable Housing Mix

The Housing Needs Assessment established there are 8,478 key workers living in the borough, and 52% of key worker households cannot afford market housing in the borough. The survey established a need for 129 dwellings per annum for key worker households - 3.4% of the total current affordable housing requirement in the borough. In terms of the overall need for intermediate housing, the Housing Needs Survey has indicated that on average around half of households in need could afford intermediate housing. However the London Plan contains a lower target for intermediate housing (30%) because of the pressing need for social rented accommodation. If the Council was to adopt a target for the provision of intermediate housing in the borough, a balance would need to be struck between the London Plan target and the local needs assessment.

Location

In order to achieve balanced and mixed communities, it could be argued that there is a need to focus provision of new affordable housing in the central and southern parts of the borough, where there is a higher proportion of market housing, rather than in the north which already has a high concentration of affordable housing. This would require a radical change of emphasis in policy such that any affordable housing being proposed by Registered Social Landlords, or coming forward through section 106 agreements in the north of the borough, should be provided off-site in the centre or south of the borough.

Go to Issue 14 on the Options Response Form

Issue 15: Houses in Multiple Occupation (HMO's)

HMOs are bedsits with shared facilities, usually bathrooms and toilets. HMOs are recognised by the Government and the London Plan as a source of low cost housing to be protected for people on low incomes. The 2004 Housing Act has set up licensing schemes to ensure adequate safety standards for HMOs. UDP policy seeks to prevent their loss to other uses unless exceptional circumstances can be demonstrated, such as failing to meet the Council's space standards or securing the essential restoration of a listed building. Under current policy, losses to the HMO stock are also deemed acceptable in locations where there is a concentration of other HMOs within the area. The Council has established a 'flagship' HMO that demonstrates very high standards of energy efficiency in the context of conservation constraints.

Go to Issue 15 on the Options Response Form

Issue 16: Housing for Special Needs

People with special housing needs include the single homeless, the elderly, those with physical or mental disabilities, people with mental health problems, women who have experienced domestic violence, students, people with a long term debilitating illness and travellers. The Council is concerned that an adequate level of special needs housing should be provided in the borough, in appropriate locations.

Recent years have seen the closure of several of the borough's residential and nursing homes for the elderly which has reduced the number of beds available and increased pressure on the remaining facilities to meet local needs. This has to some extent been offset by the provision of extra care sheltered accommodation. More extra care places are planned and a new nursing home will open in 2006. Around a half of residents needing nursing, residential or extra care have places arranged for them in homes within the borough. Of those outside, many are living near the borough boundary or have chosen to move away from Kensington and Chelsea.

Go to Issue 16 on the Options Response Form

Issue 17: Lifetime Homes

In reviewing their UDPs, the London Plan says that policies should seek to ensure that all new housing is built to 'Lifetime Homes' standards. Lifetime Homes are ordinary homes incorporating sixteen design features that can be universally applied to housing design at minimal cost. Each feature adds to the comfort and convenience of the home and supports the changing needs occurring throughout a family's life-cycle. Design features include doorways and hallways designed to allow wheelchair user access and fixtures and fittings at heights usable by all. Lifetime homes are designed to make life easier for families with young children, older people, and for those people with disabilities.

Go to Issue 17 on the Options Response Form

OFFICES AND INDUSTRY

Whilst the borough is primarily residential in character, some 7350 businesses play an important contribution to both the local and wider economy by providing a variety of employment opportunities for both local residents and workers from outside the borough.

Business uses are considered to be those activities which fall within the 'B use class', namely offices, industry and warehousing. The borough contains two types of industry – 'general' and 'light' industry.

Perhaps unsurprisingly, given a nationwide decline in traditional manufacturing there are very few 'general industrial uses' left within the borough. Those remaining are limited to small scale operations such as coach works, panel beaters and the like. However, there remains a wide variety of 'light industrial uses', a use which is defined by its ability to operate within a residential area without causing nuisance. The range of light industrial uses reflect the borough's character – primarily residential in nature yet close to central London and the media hub of the BBC in White City. The light industrial sector includes uses ranging from specialist furniture restorers, car repairs, TV studios, printers and clothing manufacture.

The borough also includes other unclassified employment generating uses found in the designated Employment Zones such as scrap-yards, auction rooms, and MOT testing stations. Employment use in this context does not include the 1,900 retail outlets, which as a principal component of the borough's centres are considered separately.

The National Approach to Offices and Industry

Government guidance seeks to promote and encourage a range of businesses whilst encouraging a pattern of land use which reduces the need to travel; in this way it seeks to allow for both economic growth and a high quality environment. The Government also recognises that there is a pressing and particular need for additional housing and encourages Councils to release land which has been previously characterised as 'employment land' where it is now seen as surplus to requirements.

The Regional Approach to Offices and Industry

The London Plan seeks to 'make London a more prosperous city with strong and diverse economic growth'. It recognises the huge contribution which the financial and business service sector makes towards London's economy and seeks a significant increase in office provision in designated 'key locations', none of which lie within the borough. However, outside of these locations, it promotes the renovation of existing stock and the provision of a variety of types of office premises to meet the needs of all sectors.

The London Plan was prepared in a climate of a continuing decline in London's manufacturing industry. The Mayor of London estimates that approximately 5000 jobs in the manufacturing sector will be lost each year up to 2016. This equates to a London wide reduction in demand for industrial land approximating to 30-50 hectares every year.



However, the London Plan stresses the important role that high value-added and design-led manufacturing will continue to have in London's knowledge-driven economy and that there is still a significant demand for high quality and flexible light industrial units in some areas. The borough's role within this sector has been recognised in its designation as a borough which should experience only a "restricted transfer of industrial sites" – this means that land should only be released from light industrial use if it can be shown to be surplus in the longer term as well as in the short to medium term.

Local Context

The UDP recognises the importance of the office sector within the borough's economy, with the majority of businesses in the borough being office based. The office sector tends to employ a greater proportion of people who commute into the borough compared to other employment generating uses. Consequently, although the Council recognises that offices remain an important source of employment,

new offices are directed to suitable locations well served by public transport where they will not increase congestion or harm the borough's residential character.

Although relatively small in number, the borough's light industrial businesses are considered to be particularly valuable, as they employ some 4,200 people and make a significant contribution to the range of jobs available to the borough's residents. These businesses are concentrated in the three designated Employment Zones: Kensal, Latimer Road/Freston Road and Lots Road; and to a lesser degree in the 5 northern wards of St Charles, Golborne, Notting Barns, Norland and Colville. There are currently 159 light industrial uses and 311 office units within the designated Employment Zones. Light industrial uses are only specifically protected by the UDP in the north of the borough and in the Employment Zones.

Map 1: The Location of the Employment Zones



The Council recognises the particular role that both small scale offices and small light industrial units play in the local economy, providing both employment opportunities and services for local residents and stimulating enterprise and economic growth and locally generated wealth. Three quarters of local businesses employ less than five people, with only three percent employing more than 50 people.

Issue 18: Encouraging Large Scale Office Developments

The UDP currently encourages large scale business developments to locate in shopping centres and other areas which are well served by public transport. However, there has been increasing pressure to allow new large scale 'headquarters' office buildings outside these centres, in particular within the borough's Employment Zones. Whilst these new businesses will contribute to the borough's economy there are concerns that their introduction could change the character of these zones, moving away from their traditional function which has been to provide small business premises.

Go to Issue 18 on the Options Response Form

Issue 19: Maintaining and Improving Employment Choice

It is important that the local economy continues to generate and retain employment opportunities for residents so that jobs and homes are accessible to each other – this both makes best use of the skills and abilities of the local workforce and minimises the need to travel.

Given the high land values within the borough, there is pressure to replace existing light industrial and office uses with 'higher value' uses such as housing. The Council wants to ensure that sufficient land and premises are retained to maintain a variety of businesses and wishes to ensure that the many small businesses which operate within the borough are protected.

Go to Issue 19 on the Options Response Form

Issues 20 and 21:

Protecting and Encouraging Small Businesses

The Council places particular value on the role that both small offices and small light industrial units play in the local economy and upon the employment opportunities they present to residents.

The UDP defines 'small businesses' as those which have a floor area of less than 100 square metres. Research carried out in preparing the UDP (currently being updated) demonstrated that there is a high demand for these 'small businesses' but with the strongest demand recorded for 'micro' units of 100 square metres or less. The Council is keen to ensure that these smaller units, whether light industrial or office, are retained and promoted within appropriate new developments.



As well as protecting small businesses in Employment Zones, UDP policies also protect them elsewhere when located in concentration, such as in commercial mews and the Principal Shopping Centres.

Go to Issue 20 and 21 on the Options Response Form

TRANSPORTATION

The National Policy Approach to Transportation

The Government intends that planning policies should influence new development and ensure that its location, scale, density, design and mix of uses reduces the need to travel and makes it easier for people working and living in new developments to access key facilities by modes other than the car. Where required, traffic management measures should improve local neighbourhoods, enhance streetscape and improve road safety.

The Regional Policy Approach to Transportation

The London Plan aims to achieve a vision of London as "an exemplary, sustainable world city". This will require a transformation in the quality of London's transport. The Plan seeks to encourage patterns and forms of development that reduce the need to travel, especially by car, and considers that inner London local authorities

should aim to ensure that overall there is zero traffic growth by, amongst other things, assessing all development proposals in terms of their traffic generation and impact on traffic congestion.

The Plan states that London's streets should perform a variety of functions. They should provide a safe and pleasant means of travelling by foot, bicycle, bus or car and act as a network of attractive public spaces in which people can meet and enjoy life.

With regard to parking, the London Plan seeks to ensure that off-street car parking at new developments is the minimum necessary and that there is no over-provision that could undermine the use of more sustainable non-car modes. The Plan goes on to say that in the most accessible locations, this should sometimes extend to car and permit-free developments.

Local Context

The borough, whilst primarily a residential area, is part of London's strategic transport system, with movement in it coming both from trips originating and/or terminating here, i.e. those by residents, visitors and workers, and from 'through traffic'.

Many of the transport-related issues affecting the borough, therefore, need to be viewed and resolved in a London-wide context, as well as reflecting residents' interests. The solutions to the many transport challenges facing London and the borough require a coordinated, strategic approach by government and its agencies, transport authorities and transport providers and operators. An effective transport system is one that is integrated with land-use planning and is based on patterns of land-use which reduce the need to travel and promote the use of public transport, walking and cycling as alternatives to the private car. The Council's transport capital investment programme includes road safety, bicycle and pedestrian schemes and measures to help buses, which together support the objectives of the Unitary Development Plan.

To guide the development of transport policy the Council has as its Principal Strategic Policy for transport: 'To seek a safe, efficient and environmentally acceptable transport system for the metropolitan area, whilst protecting the residential character, amenity and quality of the Royal Borough'.

Emissions from vehicles are responsible for a considerable proportion of air pollution. In 2000, the whole Borough was declared an Air Quality Management Area (AQMA) on the basis that nitrogen dioxide and particulate matter (to a lesser extent) would fail their respective air quality objectives set by the Government. Consequently in 2003 the Council published its Air Quality Action Plan, which set out the steps the Council is taking to work towards meeting the Government's air quality objectives.

These include working with others to improve public transport, encouraging cycling and encouraging permit-free developments.

On 30 September 2005, the Mayor of London confirmed his decision to extend the Central London Congestion Charging Scheme westwards into most of the Royal Borough. From 7am to 6pm, on weekdays, drivers will be required to pay £8 to drive on roads in the extended charging area. The scheme is likely to be implemented in February 2007. The boundaries of the extended zone will be Harrow Road (with some deviations), the West Cross Route, the southbound arm of the Earl's Court One Way System, and Chelsea Embankment. There will be no charge to use the boundary roads. All residents of the Royal Borough will be entitled to a 90% discount on the cost of the congestion charge. Traffic levels are predicted to fall inside the extension but increase on the boundary roads. A similar effect is predicted for air pollution. The extension will also have a significant effect on parking patterns in the Royal Borough, and work will be required to understand these effects. It is clear though, that the extension of congestion charging will have multiple and profound impacts on the transportation characteristics of the Royal Borough.

Issue 22: Parking

Due to a lack of off-street parking in most of the building stock within the borough there is a huge demand for on-street parking, such that residents find it difficult to find parking spaces in most areas. In order to control parking demand the whole of the borough is a Controlled Parking Zone and residential parking provision is increased where possible. There are strict parking controls in place on-street and stringent maximum parking standards or criteria for all types of development. These controls also help suppress the number of car trips to new developments.

The Council has developed a number of measures to try and ensure that parking pressure is not worsened. These include 'permit-free', where residents of new developments not provided with off-street parking are ineligible for residents' parking permits, and 'car-club' where cars are provided on-street for members to use on a pay-as-you-drive basis.

The Council is committed to improving the convenience of bicycling. As part of this it is recognised that sufficient safe, secure and convenient bicycle parking is required at people's homes and the places to which they bicycle. At present developers are required to consider the needs of bicyclists in new schemes and



where appropriate the Council provides bicycle parking when developing its own highway improvement schemes.

Motorcycles and scooters can be an economical and space-efficient means of transport and the Council is investigating ways of improving on-street parking for them. Potential improvements include, for residents of the borough, motorcycle parking bays with secure anchors for bikes where a permit would be required and more general parking for visitors' motorcycles.

Go to Issue 22 on the Options Response Form

Issue 23: Streetscape

The borough contains many examples of world-class architecture and these fine buildings should be complemented by streets designed and maintained to the same high standards - a thoughtful approach to the treatment of streetscape that seeks to bring out the best in an area should be applied throughout the borough. The Council prides itself on being a leading authority in good streetscape design and a practical guide to the Council's streetscape principles and how to apply them has also been developed to make this easier to achieve. The Council believes that the high standards that are set for the public realm should also be an important goal in new private development.



The following principles have been used in the Council's streetscape guidance:

- preservation of the historic fabric of the Royal Borough;
- respecting and enhancing local character;
- considered yet innovative design;
- experimentation – a willingness to see what works;
- reduction of clutter;
- high quality materials;
- minimum palette of materials;
- simple, clean designs;
- co-ordination of design and colour; and
- maintaining the existing and improved environment.

The pedestrian environment is a key aspect of the quality of life for those who visit, live and work in the borough. The Council's streetscape principles ensure a high quality pedestrian environment which creates many benefits for walking. Kensington High Street provides an example of how the Council has provided for pedestrians where 'staggered' crossings have been replaced with more convenient 'straight across' designs and pavements have been enlarged to provide a more pedestrian friendly and consistent footway design.

Go to Issue 23 on the Options Response Form



Issue 24: Encouraging Public Transport



The Council does not have direct control over the provision of public bus, tube and rail services within the borough. However, we work closely with Transport for London and the transport operators to help guide and improve public transport provision. The provision of new or improved public transport services is particularly encouraged in areas where at present public transport services are poor, such as in the north west and south west corners of the borough. Where possible and reasonable the Council will seek to negotiate developer contributions towards achieving the aims set out above. The Council at present considers the most appropriate location for large scale developments is where they are located in areas where access to public transport is good.

Go to Issue 24 on the Options Response Form

Issue 25: Bicycling

The Council considers all road users equally and does not presently provide facilities for one group at the expense of others. Bicycle lanes can promote a false sense of security and by encouraging bicyclists to cycle along the edge of the road can make them less visible and more at risk from turning vehicles and other hazards. One way

of providing for bicyclists therefore is to encourage the safe use of mixed road space rather than segregation, and to provide a good quality road surface and sufficient parking facilities as discussed above.

Go to Issue 25 on the Options Response Form



Issue 26: Gated communities

In recent times, certain schemes have included 'gated communities' with private roads that are only accessible to occupiers of the development. This provides benefits in terms of perceived safety for the residents of gated communities or particular streets and mews, however it denies the general public access to routes that would otherwise be public rights of way.

Go to Issue 26 on the Options Response Form

SHOPPING AND TOWN CENTRES

The National Approach to Shopping and Town Centres

The Government sees town centres as areas where a whole range of 'trip generating' uses should be concentrated; not just shops but restaurants, clubs, cinemas, offices, hotels or any other uses which attract a lot of people. This will ensure that a wide range of services are provided in those areas well served by public transport both enhancing consumer choice and reducing the reliance on the car. The Government recognises that London contains a network of centres each of which will perform a different function according to the community and area it serves. This will give the widest access of 'town centre' uses to the greatest number of people.

The Regional Approach to Shopping and Town Centres

The London Plan translates this theory onto the ground suggesting a four tier hierarchy of centres across the borough concentrating the supply of retail and leisure facilities in the most accessible places. The higher a centre is in the hierarchy, the larger its catchment and the broader its role. A major centre such as Kensington High Street will serve residents across the borough and beyond, whilst a local centre or small parade of shops will only provide for the day-to-day needs of the local community.

The widening of the role of town centres is central to the London Plan, with the vitality and viability of town centres seen to be enhanced by the wider range of

non retail 'town centre' uses. Conversely the London Plan recognises the impact that these uses can have in inaccessible residential areas and will discourage town centre uses outside designated centres.

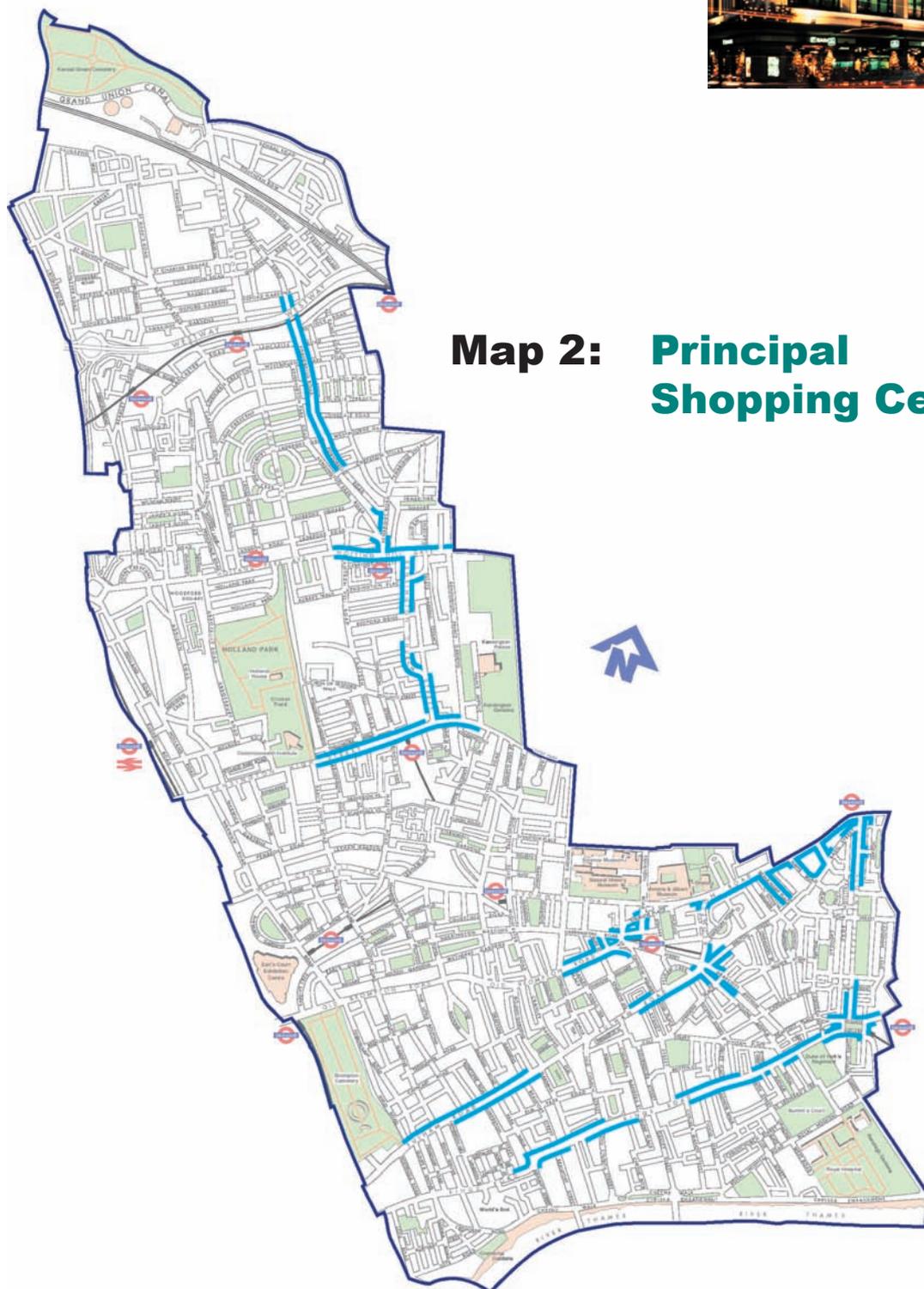
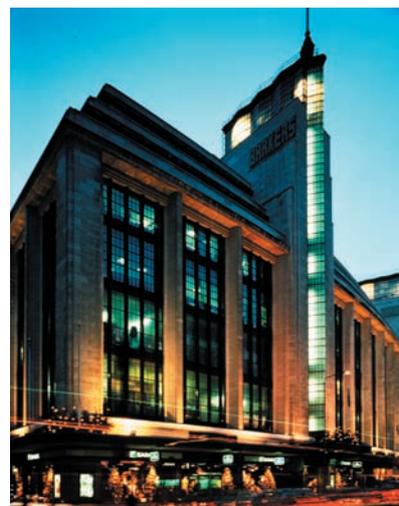
**Table 2: The London Plan
Town Centre Hierarchy**

Type of Centre	Name	Characteristics
International Centre	Knightsbridge	Major concentrations of globally attractive, specialist or comparison shopping.
Major Centres	Kensington High Street King's Road (East)	Important shopping and service centres, often with a borough-wide catchment. Some also have leisure and entertainment functions.
District Centres	Portobello Road Notting Hill Gate Fulham Road (East) South Kensington Earls Court Road King's Road (West) Fulham Road (West)	Provide convenience goods and services for more local communities. Some have developed specialist functions, often as a result of their lower rents. Have an essential convenience shopping function.
Local Centres	Largely equate to the Council's 'Local Shopping Centres'	Provide services for local communities.

Local Context

The borough contains some of London's finest shopping areas including Kensington High Street, Knightsbridge, King's Road and Portobello Road. The retail sector has some 335,000 square metres of floorspace, serving the dual purpose of providing for the day-to-day 'convenience' needs of residents as well as serving the wider shopping needs of both residents, other Londoners and visitors. It is the nine Principal Shopping Centres and thirty seven Local Shopping Centres which have provided the focus for shopping uses in the past and are likely to do so in the future. The UDP promotes a sustainable pattern of development by ensuring that

the Principal Centres continue to be the focus for shopping and other key shopping centre uses. The distribution of Local Centres has been maintained in order to try and protect the provision of day-to-day needs.



Map 2: Principal Shopping Centres

Issue 27: The Hierarchy of Town Centres

The UDP does not designate town centres – it refers to Principal and Local Shopping Centres. Each type of centre is seen to have a different function – and the policies within the UDP reflect these functions. The policies within the UDP generally resist the loss of any shops in an attempt to ensure that Local Shopping centres continue to serve the day-to-day needs of local people. The emphasis for Principal Shopping Centres, is quite different. Whilst the retail function of these centres is protected, the UDP gives scope for other high trip generating uses to locate in these centres.

If it is to be consistent with national guidance and in general conformity with the London Plan, the LDF should propose town centre designations which would reflect the function of each level of centre within the proposed London Plan four tier hierarchy. The LDF should contain different policies for each type of centre.

Retailing is clearly the most important activity in shopping centres as shopping is the main reason people visit them. The Council's view is that it is important to maintain a substantial amount of shopping floorspace in shopping frontages.

Go to Issue 27 on the Options Response Form

Issues 28 and 29: Which Function for Town Centres

The nature of the borough's shopping centres is such that there has always been pressure to allow a mix of both shop and non-shop uses. This diversity of uses has been re-emphasised by both Government policy and by the policies within the London Plan. If you agree that the principal use of the borough's town centres should remain retail, the LDF must nevertheless consider the appropriate balance of other competing 'town centre uses' - be these residential, offices, health care facilities, education establishments, bars, restaurants, hotels, cultural and leisure activities.

This diversification of 'town centres' includes Local Centres which have traditionally served the day-to-day shopping needs of local people. The Council recognises that although Local Centres still have a particularly important role to play in providing for needs of local people, these needs may go beyond 'top up' shopping.

There are clearly some uses which would appear to sit comfortably within town centres with a wider role. The Kensington and Chelsea Primary Care Trust could locate doctors' and dentists' surgeries within shopping centres for example, while the Metropolitan Police has plans to locate 'police shops' within retail units - both

types of use would benefit from the high accessibility associated with town centres. Similarly the Council recognises the important role that both small and large offices have played in providing jobs and contributing to the local economy. Large scale offices attract large numbers of people and these uses are well suited to accessible town centre locations – and the shops would benefit from the increased custom. However, the capacity of the borough’s shopping centres is limited and the LDF will have to decide on which of these many uses should be supported.

Go to Issue 28 and 29 on the Options Response Form

Issue 30: Maintaining Town Centre Identity and Protecting Valued Uses

The borough is fortunate in that it benefits from a range of centres many of which have their own unique character. For example, Portobello Road has both its own antique quarter and is home to one of London’s most diverse street markets; King’s Road (West) retains a character reflecting its bohemian roots whilst Fulham Road (East) contains ‘Brompton Cross’, one of London’s most exclusive shopping venues. However, the Council cannot take these differences for granted and recognises that there is an increasing homogenisation of centres across London and the country as a whole – recently referred to as ‘cloned town centres’.



There are no planning powers to either protect or resist certain shopping uses - consequently we can do little to protect specific shops such as post offices, chemists and newsagents from changing into other types of shops, such as clothes or shoe shops. This can be frustrating to residents, but all that can be done at the moment is to signal how important these uses are, to encourage their retention and to maintain a range of suitable premises for such uses to locate in.

Go to Issue 30 on the Options Response Form

SOCIAL AND COMMUNITY USES

The National Policy Approach to Social and Community Services

Government guidance seeks to provide a good range of services and facilities, which are easily accessible to everyone. It encourages the provision of social and community facilities within town centre locations in order to:

- to reduce the need to travel and encourage public transport, walking and cycling;
- to facilitate multi purpose journeys; and
- to ensure that all sections of the community have access to a wide range of services and facilities.

The Regional Policy Approach to Social and Community Services

The London Plan states that accessible and affordable social and community facilities are the key to enabling a community to function and thrive. Boroughs should make assessments of local needs, identify gaps in provision and assess the needs for social and community facilities. Land already used for these uses should be safeguarded and where appropriate new sites should be identified to meet any additional demands. In particular the planning process and planning obligations should be used to address the shortfalls in social and community facilities. The provision of adequate facilities for these uses is therefore particularly important in areas of major new development.

Boroughs are encouraged to promote the objectives of the NHS Plan and to work in partnership with the strategic health authorities, the primary care trusts and local strategic partnerships to support the provision of additional healthcare within their borough. Local Authorities are also encouraged to promote London as a national and international centre of medical excellence and specialised facilities.

Local Authorities are also encouraged to work with the Mayor of London and Central Government to assess and review the strategic educational needs of their boroughs and the land use implications of future development.

Local Context

The provision of social and community facilities – including hospitals, clinics, schools, colleges, welfare and community centres - is essential if the vitality and amenity of the residential areas of London are to be supported. Many health and education and education facilities in the borough serve populations from across London and have

London wide, regional, national and international significance. The UDP protects and encourages facilities which are easily accessible to meet the needs of those who live, work and study in the borough. It has two overall objectives:

- to protect social and community uses in the borough where an established local need exists; and
- to encourage the provision of new facilities in appropriate locations, in line with the needs of the borough's population.

The residential nature of the borough puts great pressure and demand upon the existing provision of educational facilities. There are 37 schools maintained by the Council, educating almost 10,946 young people. While the 26 maintained primary schools provide places for virtually everyone who wants one, there are only four secondary schools. Many of our secondary school-aged children have to find places in maintained schools outside the borough. There are also 38 independent schools located in the borough. Such schools are popular with many parents – some 51 per cent of school age children are educated in independent schools (compared to 7% nationally). The Council generally welcomes proposals for educational facilities where they meet an established need or shortfall in provision and is itself pursuing the provision of an additional secondary school in the south of the borough.

The Council is concerned that health facilities generally are protected in order to ensure the provision of accessible health care for all borough residents. The loss of existing health care provision is resisted and the provision of additional facilities, which meet an established local need, are encouraged. Health facilities are provided by the National Health Service, the private health sector and a small number of voluntary and non-profit making organisations.

Issue 31: New Social and Community Uses

Health, education and similar facilities are currently protected or encouraged by policies contained within the UDP depending upon an applicant demonstrating that a proposal meets 'local' needs. Facilities which may cater for a wider geographical area will normally be resisted except where there is a particular need for the use to be located in the borough.

There are a number of uses which fulfil important roles in peoples lives but which do not fit easily into any categorisation – for example, petrol filling stations are essential for those who use a car and have the potential to be the future locations for the distribution of 'greener' fuels – but there are few petrol filling stations left in the borough. The Metropolitan Police are planning to set up 'Police Shops' (to

provide a readily accessible and visible police presence in the high street) and 'Safer Neighbourhood Team' bases (a base for a dedicated local police team that would patrol an area on foot and cycle) – and these may require that existing policies, like the protection of shops, may need some adjustment. Launderettes and public conveniences could also be considered in this context. Do you agree that is it important to plan for and protect the type of uses referred to above?

Go to Issue 31 on the Options Response Form

Issue 32: Private Schools and Health Facilities

Social and community uses can be divided into those provided by the private sector, those provided by the public sector such as the National Health Service and a small number of voluntary and non-profit making organisations. Should private sector facilities be as equally welcome as public sector ones? Should 'local need' be a consideration in considering applications for private health facilities and educational establishments or does it matter if they are available to anyone? Should the borough seek to establish itself as a recognised centre for the private health consulting industry?

Go to Issue 32 on the Options Response Form

Issue 33: New Fee-paying Schools

Fee-paying schools are popular with residents. However, they have difficulty in keeping or finding suitable premises for expansion, as many are located in residential areas, and they can be harmful to residential amenity and cause nuisance to neighbours. As such the UDP generally seeks to limit the growth of such facilities where they do not meet local need. Should the LDF promote more facilities?

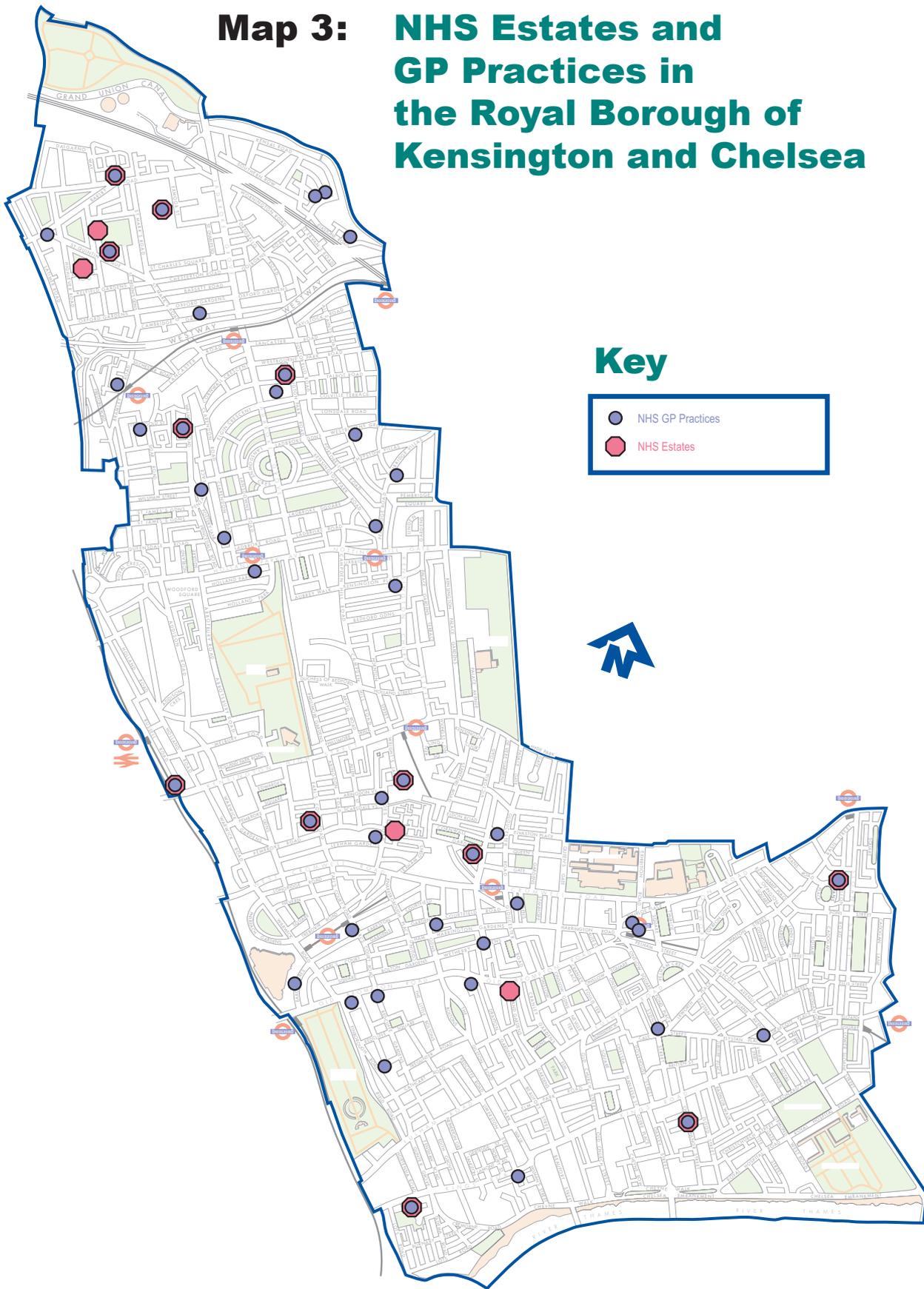
Go to Issue 33 on the Options Response Form

Issue 34: Doctors' Surgeries

There are specific long term challenges to face in providing general practitioner services. A large proportion of GP's in the borough are close to retirement age and since many GP's own their own premises the number of health facilities available in the borough may fall. Obtaining new premises in a borough with the highest housing prices in the country is extremely difficult. The UDP seeks to resist the loss or secure the replacement of such GP facilities. Where should new surgeries be located?

Go to Issue 34 on the Options Response Form

Map 3: NHS Estates and GP Practices in the Royal Borough of Kensington and Chelsea



HOTELS

Tourism is one of Britain's major industries, generating both wealth and employment. The accommodation of tourists and business visitors within London and the South East contributes to the continuing role of London as a capital city. In 2003, it was estimated that 25,000 people were employed in tourism related activities and that over 17 million tourists visited the borough, spending in excess of £2 billion. However, there can be drawbacks - for example a concentration of hotels, tourist hostels and other forms of visitor accommodation within the borough can represent a threat to local residential character and amenity.

The National Policy Approach to Hotels and Tourism

The Government stresses the need to focus development, including hotel provision, in town centres and to promote high quality design. The Government's tourism objectives include:

- to take full account of the particular needs and character of individual areas;
- to secure a balance between maximising the economic and employment benefits of tourism and protecting the interests of the communities that cater for its needs but feels its effects; and
- to consider, as with other types of development, the impact of each proposal on the environment and neighbouring amenity.

The National and Regional Policy Approach to Hotels and Tourism

The London Plan seeks 36,000 additional hotel bedrooms in London by 2016 and an improved distribution of visitor accommodation and facilities. The Mayor of London's Tourism Strategy seeks to ensure that London expands as a tourist destination and also develops a broader visitor base. The London Plan does not envisage any large scale hotel and tourism facilities being located within the borough. Boroughs are asked to:

- identify capacity for new hotel provision in town centres which have good public transport links;
- accommodate smaller scale provision in town centres and resist further provision in areas of existing concentration, except where this will not compromise local amenity or the balance of local land uses;
- support the provision of a wide range of tourist accommodation, such as apart-hotels, bed and breakfast accommodation, self catering facilities, youth hostels and camping and caravan sites; and

- support existing, and encourage development of new, tourist attractions which complement the wider policies of the London Plan, especially for town centre and regeneration renewal.

Local Context

With nearly 200 hotels, the borough makes a substantial contribution to the provision of visitor accommodation in the metropolitan area. There has been a reduction in the number of hotels in the borough since 1996, although the number of bedspaces has remained reasonably constant.

Issue 35, 36 and 37: Control, Location and Quality of Visitor Accommodation

The Council's present policy is one of restraint because it is considered that further significant provision would be detrimental to the residential character and amenity of the borough. However, the Council has also recognised that there is a continuing demand for further bedspaces and on this basis hotel development has been permitted in a limited range of circumstances. These have included where there has been no loss of permanent residential accommodation, residential amenity has not been compromised, there have been no adverse effects on highway safety and the site has been well served by public transport.

There are concerns about the quality of some of the visitor accommodation in the borough, which at its worst offers poor conditions at relatively high prices. At the lower end of the market, visitor accommodation can be of a sub-standard nature which projects a poor image of the borough. Encouraging improvement in quality across the range of visitor accommodation, including existing accommodation, with an emphasis on the upper end of the market may generate greater revenue and employment. The UDP does not address the issue of quality of the hotel stock.

What approach should the LDF take to further visitor accommodation?

Go to Issues 35, 36 and 37 on the Options Response Form

Issue 38: Protecting the Hotel Stock

The Council does not have any policies which resist the loss of hotels to other uses. The Council has received applications to change hotels – usually to residential or to other forms of tourist related accommodation, such as serviced flats for short-term stays. Losing hotels to homes clearly increases the residential stock

and reduces possible adverse impacts on residential amenity. Losing hotels to other forms of short-stay accommodation may simply result in another form of impact on residential amenity and there are no planning standards currently in place to control the quality of provision, for example minimum room sizes.

Go to Issue 38 on the Options Response Form

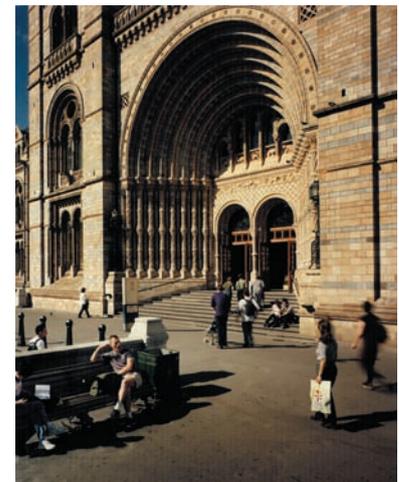


Issue 39: Encouraging Tourism?

The Council's aim is to secure a proper balance between maximising the economic and employment benefits that tourism can bring by respecting the needs of the tourist industry and its customers whilst at the same time safeguarding the environment by protecting the interests of the communities that cater for its needs, but feel its effects. The current Exhibition Road Project is an example of the Council working in partnership to create an attractive environment to show that South Kensington is looking to the future and setting new standards of urban design and which will benefit both residents and visitors.

What approach should the LDF adopt to tourism?

Go to Issue 39 on the Options Response Form



LEISURE AND RECREATION

The National Policy Approach to Leisure and Recreation

The Government acknowledges that the provision of open spaces, sport and recreation facilities improves the quality of people's lives. Good quality assessments and audits, leading to clear strategies supported by effective planning policies, will provide vital tools for resolving the potential conflicts that arise between different uses and users of open space, sports and recreational facilities. Open spaces, sports and recreational buildings should not be developed unless an assessment has been undertaken which has clearly shown that the facilities are surplus to

requirements. High quality provision, or that which has particular value to a local community, should be recognised and given protection in development plans.

The Regional Policy Approach to Leisure and Recreation

The London Plan seeks to ensure diverse opportunities to enjoy London through its culture, shopping, sport, tourism and open spaces. One of the underlying aims of the Plan is to increase the population and economic growth of the city. However, as development intensifies it is recognised that access to leisure and recreational activities needs to offer a release from metropolitan life and enhance London's standing as a centre of culture, relaxation and innovation. Making London a more enjoyable place to live in may also contribute towards improving the quality of town centres and strengthening the leisure and cultural sectors.

The London Plan seeks to achieve the widest access to leisure activities, including sports facilities, for the greatest number of people by concentrating the supply of leisure facilities in the most accessible places such as town centres.

Protecting and adding to London's open spaces is especially important to making London a better city for people to live in. London's network of open spaces should be protected and made more accessible and enhanced. It is recognised that as the use of land becomes more intense, the contribution of open space will become even more important.

Local Context

The borough has within its boundaries facilities which contribute to the character and function of London as an international city - such as the South Kensington Museums, Kensington Palace, the King's Road and Portobello Road. The borough is also well provided with arts cultural and entertainment facilities which make an important contribution to the quality of life of local residents, workers and visitors. The borough suffers from an overall shortage of public open space and so both public and private open space is protected because of its great amenity value.

Existing recreation provision is inadequate to meet the wide ranging demands placed on it. While there are leisure facilities such as sports facilities and private health and fitness clubs in the borough, there is a shortage of indoor sports in the south. However, the opportunity to provide further facilities to meet the needs of all members of the community are very limited - in a borough as intensively developed as Kensington and Chelsea, the scarcity of suitable sites, and the pressure to provide for other activities and services, mean that it is difficult to provide, for example, more public open space without demolishing existing buildings.

Issues 40, 41 and 42: Public Open Space Provision

The borough suffers from an overall shortage of public open space whilst having the highest density of population in London. In terms of population density, the borough has the highest number of residents per hectare of any borough in London (131, against the London average of 46 people per hectare). Existing policy protects and seeks to improve existing provision of public and private open space, particularly in association with appropriate development proposals.



Preventing the development of open space is straightforward; creating new open spaces anywhere in the borough is problematic given high land values, the intensity of development and the need to secure other vital provision, such as affordable housing, from development. What approach should the LDF take?

Go to Issues 40, 41 and 42 on the Options Response Form

Issue 43 : Access to Private Garden Squares and Private Communal Gardens

The borough's public open space deficiency is mitigated by private open spaces such as private garden squares and communal gardens. Access to these spaces is normally available to a restricted number of households, as decided by the owners or management trustees, and in most cases on the payment of a garden rate. Many garden squares and communal gardens operate under Acts of Parliament,



which state how they will be managed and paid for. Despite access being restricted, garden squares provide a large proportion of the open space in some wards. They therefore have great value as a recreational resource and also the ability to take the pressure off existing public open space, especially in areas of deficiency.

The Council is committed to the preservation of private garden squares and communal gardens and is opposed

in principle to development within or under them. It is accepted that the granting of access to formal garden squares and private communal gardens in the Borough is a matter for each owner and/or garden square committee and in some cases for primary legislation, but wider access to such space could benefit those people who have no direct access to other amenity space. This could range from unconstrained opening to the general public or occasional opening to specific groups or specified individuals. Should the LDF address the issue of access to communal gardens and garden squares?

Go to Issue 43 on the Options Response Form

Issue 44: Temporary Uses of Open Space

Public open space in the borough provides a valuable amenity, wildlife and recreational resource. In addition there are other open spaces which contribute significantly to the quality of the urban environment. They are valuable not just because some public access may be afforded but also their history, wildlife and visual amenity. The temporary use of these open spaces for a variety of events can make a major contribution to the borough's diversity, culture and economic wellbeing with some, such as the Chelsea Flower Show, of international renown. However, the persistent use of open space for such events can change its character to a predominantly commercial one which can pose a threat to the amenity of local residents. In the past the UDP has generally resisted proposals which could adversely affect the setting of open space, but in terms of temporary uses, where control has existed, a balance has been sought between commercial uses and the need to retain the open nature of the site.

Go to Issue 44 on the Options Response Form



Issues 45, 46 and 47: Arts, Cultural and Entertainment Facilities

The borough contains a variety of arts, cultural and entertainment facilities, ranging from museums and art galleries to theatres, cinemas and nightclubs. As part of the wide variety of entertainment offered by central London, several of these facilities are enjoyed by a national and, in some cases, an international audience. The cultural diversity of the borough, which includes a large ethnic minority population, increases the need for a wide range of leisure and recreation facilities. However, the Council must also pay careful regard to the possible adverse effects of such uses on residential areas by way of increased noise, traffic and pedestrian movement.

Go to Issues 45, 46 and 47 on the Options Response Form

Issue 48: The Role and Location of Public Art

The Percent for Art campaign, launched by the Arts Council in 1989, seeks to improve the environment by employing the talents of Britain's artists and crafts people in building projects. The Council has supported the aims of the campaign and has encouraged developers to contribute towards the provision of public art within the borough. At present there is a Percent for Art scheme which has provided public art at various locations around the borough and the Council has recently published a supplementary planning guidance note on Public Art. How important is public art?

Go to Issue 48 on the Options Response Form



RENEWABLE ENERGY AND SUSTAINABLE DESIGN

The National Policy Approach to Renewable Energy and Sustainable Design

Climate change is a topic that is frequently discussed. Under the Kyoto Protocol, the UK has a legally binding target to reduce emissions of six key greenhouse gases (including carbon dioxide) by 12.5% relative to the 1990 level over the period 2008 to 2012. It also has a domestic goal to cut CO₂ emissions by 20% below 1990 levels by 2010. Increased use of renewable energy technologies is one of the main ways in which harmful emissions can be cut. Renewable energy is energy

derived from a source that is continually replenished such as wind, wave, sun and water. The Government says that Councils may include policies in their plans that require a percentage of the energy to be used in new residential, commercial or industrial developments to come from on-site renewable energy sources. Small scale renewable energy schemes such as solar panels, biomass heating, small scale wind turbines, photovoltaic cells² and combined heat and power (CHP) schemes can be incorporated both into new developments and some existing buildings.

The Government recognises the sensitivity of conservation areas and listed buildings and acknowledges that renewable energy projects should only be granted where it can be demonstrated that conservation objectives will not be compromised.

The Regional Approach to Renewable Energy and Sustainable Design

The London Plan also recommends the incorporation of CHP along with community heating schemes in new developments wherever feasible. It also encourages the use of energy efficient measures in both new development and the existing building stock; such measures should not be precluded in areas of heritage, but should be designed sensitively. The London Plan also states that boroughs should require major developments to show how the development would generate a proportion of the site's electricity or heat needs from renewables, wherever feasible. The Mayor of London has developed an 'energy hierarchy' which states that essential energy needs should be met through applying the following factors in sequence; using less energy, using renewable energy and supplying energy efficiently.

Local Context

The UDP encourages energy efficiency through the siting, landscaping, design, use of and re-use of materials, orientation and lighting of buildings.

Issues 49 and 50: Renewable Energy and Sustainable Design

The UDP acknowledges that energy efficient buildings are more difficult to design in densely built up areas like the borough because there is more overshadowing and building orientation is largely fixed. Conservation area and listed building policies may also restrict the use of some energy saving proposals. The re-use and/or upgrading of existing buildings rather than their redevelopment is promoted. Does the UDP go far enough?



Go to Issues 49 and 50 on the Options Response Form

² Photovoltaics (PV): The direct conversion of solar radiation into electricity by the interaction of light with the electrons in semiconductor device or cell.

WASTE

The National Policy Approach to Waste

European and Government policy and directives require both substantial reductions in the use of landfill and increases in recycling and composting. The Government wants local planning authorities to identify sites for waste management and disposal facilities over the period of the plan. Existing sites with potential for expansion should be included. It also promotes the proximity principle (treating the waste as close as possible to the source of production) and the desirability of regional self-sufficiency.

The Regional Policy Approach to Waste: The London Plan

London recycles less than half of its waste – with 70% of municipal waste going to landfill. The London Plan sets an overall London-wide target to ensure sufficient capacity to manage 75% of waste arisings within London by 2010. It also sets targets for the recycling of household waste. The Mayor will consider other waste management methods (waste minimisation, recycling, composting and emerging technologies) in preference to any increase in mass burn incineration capacity. Boroughs are asked to safeguard all existing waste management sites, identify new sites for new facilities and identify and forecast total waste arisings and the amount of waste that will be imported and exported. Any new facilities should be located in Preferred Industrial Locations or existing waste management locations.



The Mayor of London's Municipal Waste Strategy requires that waste should be treated in the following priority order: to reduce, re-use, recover (recycling, composting, energy), dispose – on the basis that energy recovery is not considered before the opportunities for recycling and composting have been maximised. Priority should be given to facilities for movement by river or rail.

Local Context

Collection of waste is the responsibility of the Council, and disposal is the responsibility of the Western Riverside Waste Authority (WRWA). Waste and recycling is collected twice weekly from households and up to three times a day from commercial premises. The waste is delivered by road to WRWA's riverside transfer station in Wandsworth, loaded onto barges, and taken down the Thames to a landfill site in Essex. The landfill site is scheduled to close in December 2007 although a short extension of its life may be possible.

This use of landfill is therefore the Council's principal current means of waste disposal, although diversion of material to recycling plants now accounts for some 20% of the borough's waste stream. The Council, however, recognises the detrimental environmental impact of landfill and anticipates it will be an increasingly expensive disposal method in the future because of an increase in landfill tax and the impact of the Landfill Allowance Trading Scheme.

Issue 51: Disposal of the Borough's Waste

Consequently - with its partners in the Western Riverside Waste Authority - the Council has been trying for some years to shift from dependence on landfill towards disposal by means of an Energy from Waste plant. The Council has been lobbying the Government to grant permission for an Energy from Waste plant at Belvedere, a site on the river Thames that would continue to allow the transportation of waste by barge. Government consent for this plant is vital to ensure that the WRWA has a long-term solution to the challenge of disposing of the borough's waste. Without it, the Council faces extra waste disposal costs of around £5 million a year, and rising, by 2012.

The current landfill system, and the proposed Energy from Waste system, both depend on facilities out of the borough. This is principally because of the dense residential character of the borough - and indeed of much of the WRWA area - which means that most of the borough has been considered unsuitable for waste management facilities. How should the LDF address this issue?

Go to Issue 51 on the Options Response Form

Issue 52: Cremorne Wharf

The UDP resisted the loss of Cremorne Wharf as a waste management facility because this site had the potential to play an integral part in future river-based waste disposal systems. Since the UDP was published the Cremorne Wharf Civic Amenity and Recycling Centre has closed to the public, who are now directed to WRWA's facilities in Wandsworth. Cremorne Wharf is currently used as a bulking station for dry recyclable materials before they are transferred by lorry to a processing plant. This is a temporary use pending the planned construction of a Materials Reclamation Facility on WRWA land in Wandsworth - a development that is in turn dependent on consent being forthcoming for the Energy from Waste plant at Belvedere. The Mayor of London has issued a 'direction' which seeks to maintain Cremorne Wharf as a wharf, but its future use will have to be addressed in the LDF.

Go to Issue 52 on the Options Response Form

SITE ALLOCATIONS

In order to give you the opportunity to comment on large development proposals early on in the LDF process, we need to know about those sites which are likely to be coming forward for development in the next ten years. All those who wish land to be allocated for development should ensure that their sites are brought forward early in the process, so that proposals can be subject to formal consultation and sustainability appraisal. Sites introduced late in the plan making process may be disregarded by the Planning Inspector at the examination in public as they would not have been through the statutory procedures.

Go to the Site Allocations question at the end of the Options Response Form

