

Proposed Submission Core Strategy for the Royal Borough of Kensington and Chelsea with a focus on North Kensington

Development Plan Document

Local Development Framework

Publication Stage Representation Form

Please e-mail this form to: planningpolicy@rbkc.gov.uk

Alternatively send this form to:

Planning Services
Policy Team
Room 328
The Town Hall
Hornton Street
London
W8 7NX

For further information:

Visit our website at: <http://ldf-consult.rbkc.gov.uk>

Phone the LDF hotline on: 020 7361 3879

Responses must be received no later than midday Thursday 10th December 2009

Personal Details

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To be “sound” a core strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

“Justified” means that the document must be:

- founded on a robust and credible evidence base
- the most appropriate strategy when considered against the reasonable alternatives

“Effective” means that the document must be:

- deliverable
- flexible
- able to be monitored

“Consistent with National Policy” means that it is consistent with government guidance contained within Planning Policy Guidance and Planning Policy Statements

Do you consider the core strategy to be legally compliant?

Yes

No

Do you consider the core strategy to be Sound?

Please tick the appropriate box

If you have selected YES and you wish to support the legal compliance or soundness of the core strategy, please be as precise as possible when setting out your comments below

Please make it clear which Paragraph number, Vision box number, Policy box number or Objective box number you are commenting on.

Please attach additional pages as required

If you have selected NO do you consider the core strategy to be unsound because it is not.

Justified

Effective

Consistent with national policy

Please tick the appropriate box

Please give details of why you consider the core strategy to be unsound or not legally compliant. Please be as precise as possible when setting out your comments below.

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Policy CO 1.1
Paragraphs 30.3.2 & 30.3.4

It is well known that 52 per cent of K&C children attend private schools but it seems less well-known by the Council that many such schools are short of space (including playgrounds). The loss to housing, in recent years, of such education sites as the College of St Mark & St John, Chelsea College of Art and the Former Jamahiriya School, eliminated valuable social and community land use opportunities. The Core Strategy at present contains no provision to ensure a better future for the needs of children at independent schools.

The Strategy is effective in protecting existing uses and in permitting enabling development for the modernisation of social and community facilities.

Building an Academy in West Chelsea and another primary school in Warwick Road are also very welcome. However they will not benefit children at EXISTING independent schools in the south of the Borough. In

particular they will not provide them with needed sports facilities, outdoor play space or gymnasia. (Hampshire Gems, recently re-established in the old Chelsea Public Library in Manresa Road, for instance, has no playground just a slip of outdoor space.)

Independent schools do use the Chelsea baths but because of demand are pushed to the very extremities of the day.

The lack of any surveys of the schools and facilities of half the children in the Borough, the absence of any forecast of future demand flowing from the expansion of housing set out in Chapter 35 of the Core Strategy. and the absence of any effort to identify additional sites for the recreation and other uses of children at independent schools, points to both unsoundness and ineffectiveness in the Core Strategy.

The Chelsea Society does not underrate the difficulty that this issue raises for the Borough Council. We are not seeking to have Policy CK 1 struck down. We do however want to draw attention to a lack of balance that is present in the Plan due to the provision for expansion of housing (at, for instance Warwick Road and the site of the Earl's Court Exhibition and an overall 20,000 increase in population) even though the existing social and community needs of existing residents are not being met. The question that needs to be addressed is whether too many additional people and too much additional housing is being provided for in a Borough that already has the highest density in Britain/ The Society fears that this is the case and that more space needs to be allocated to social and community needs.

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Para 2.2.1.

Para 35.3.1

Policy C 1

Policy CH 1, CH 2

Policy CH 3 Para vi

Policy CT 1 Para b

HOUSING, ADDED POPULATION, DENSITY AND COMMUNITY FACILITIES

The Core Strategy, taking its lead from the GLA and the London Plan, envisages some 6,000 new dwellings over a decade. (Population is forecast to rise by 20,000.) This housing expansion will occupy much of the developable land in the Borough and significantly increase

the overall density of the densest local authority in Britain.

But many of the ancillary social, medical and commercial services on which residents rely are already over-subscribed, have little of no room in which to expand and are faced by prohibitive K&C land values if they want to expand.

If the Inspector was to talk to residents about this he would find them speaking of surgeries with waiting lists, standing room only on buses, long queues at post offices, lack of on-street visitor parking space, tiny flats and inhuman cramming on the Underground. These are, of course, the views of middle-income residents, not the rich. (But as Figure 8.3 shows, the Borough has a high proportion of residents with incomes of £35,000 and below.)

The Society does not suggest that delivering additional houses on what are currently non-housing sites would be ineffective in meeting housing demand. The issue is the relationship between that new housing (and additional population) and the capacity of a wide range of social and physical facilities. There is insufficient evidence on the impact of this increase in population on social and community services. The question never seems to be addressed. It is assumed that higher population density is justified without exploring its side-effects.

Policy C1 does, of course, require additional social facilities to be financed via S.106 Agreements. But there is no assessment of the scope for expanding the supply of the Borough's already overstretched infrastructure of public transport and roads, surgeries and post offices, playing fields and parks.

How, for instance, will the construction of new flats on the site of the Earl's Court Exhibition solve the problems of acute congestion (due both to District/Circle/Piccadilly line interchanging passengers and heavy local demand) at Earl's Court Underground Station?

How, furthermore, does the Plan reconcile all the proposed new residents with Policy CT1 (b). 'Ensure that development will not result in any material increase in traffic congestion.....' ? Additional residents will lead to additional servicing vehicles ranging from refuse collection to plumbers, parcels delivery, computer technicians, lift engineers and building contractors. Additional residents will also generate additional business and family visitors. Even if residential development is 'permit free' it will still contribute to traffic.

Increasing the Borough's population will put its social and community infrastructure under even greater pressure. This problem is not assessed. No evidence is advanced to justify the addition of 20,000 residents. The Society considers that the Plan is unsound.

The plan needs either to scale down provision for increased population or show how the supply of social and community infrastructure should be expanded – or a mix of the two.

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Proposals Map opposite Page 158

Policy CL 1

CE 2

CE2 (c)

CE4 (c)

THE RIVER THAMES

The Embankment and the spaces fronting it (eg the Royal Hospital) are a Chelsea amenity of the greatest importance and the area based on the river itself – the Thames Policy Area - is designated as a 'site of metropolitan importance'. The Society is concerned that little specific is

said about it in the Core Strategy. It is important to be able to protect this valued place from intrusive development, to protect views and vistas to and from it along and across the Thames, and to protect it from any consequences of the construction and completion of Thames Water's new sewage tunnel and connectors.

Policy CL1 (e) is insufficient. Ideally the Thames Policy Area out to be identified as a 'place'. Views to and from the Royal Hospital and views along and across the Thames, especially from the bridges should be identified and protected. Proposals should be made to work with TfL on creating additional pedestrian crossings and to provide for cyclists in ways that give people on foot safe use of Bazalgette's famous belvedere walkway The Embankment is a unique and wonderful place. The need to rescue the Embankment from domination by traffic should be stated. Over 20 years much could be achieved.

The Core Strategy is ineffective in identifying a Thames Policy area, in addressing its needs, in setting out policies for its protection or in identifying the potential for river-related uses. This makes it unsound.

The Plan should show a Thames protection area on the Proposals Map. It should draw together into a single policy or an SPD all the policies that relate to the Thames and its frontages and set out measures for conservation and development.

The Society also suggests, that in the absence of a 'place' for the Thames, further policy is added in section 4.4, with text along the following lines

In addition to the 14 places identified, the Thames is of particular importance to the borough. Policies ensuring the long term protection of the Thames are contained in chapters 30 – 36, but to ensure the protection of the Thames, a further specific policy is introduced here:

CP3 The Council will protect, promote and enhance the environment of the Thames area as defined on the proposals map

10 December 2009

Please attach additional pages as required