



THE CHELSEA SOCIETY

founded by Reginald Blunt in 1927 to protect and foster the amenities of Chelsea

www.chelseasociety.org.uk

Chairman Stewart Corbyn

From: Terence Bendixson, Hon. Sec. Planning
39 Elm Park Gardens, London SW10 9QF
Tel & Fax 44 (0)20 7352 3885 t.bendixson@pobox.com

LDF Core Strategy - Pre-Hearing for the Public Examination

Briefing note on proposed Chelsea Society evidence
8 June 2010

A. The LDF Submission Core Strategy

The Chelsea Society, in general, supports the Submission Core Strategy. It is a marked improvement on the former UDP and the Society wants to put on record the help given by Councillors and Officers of the Royal Borough throughout the plan-making process. Officers have been outstandingly helpful. The Society does, however, have reservations about some policies. These are set out below. The tests for soundness used by the Society are summarised in an appendix.

B. The Chelsea Society's concerns.

1. Keeping Life Local: Social and community uses - schools

i) The Society is concerned that, although private education caters for 52 per cent of all children in the Borough Para. 2.2.14 makes no reference to independent schools. Furthermore although pupil numbers can be expected to expand with a forecast population increase of 20,000 over 20 years (Para. 2.2.1), the Strategy gives no consideration to how such independent schools might grow nor how already under-provided facilities for gym, swimming and other sports might be expanded too. This is a serious omission.

ii) Under the UDP, the Borough repeatedly allowed educational land in Chelsea to be converted to housing. This has depleted the stock of sites for social and community use and smaller independent schools, such as Cameron House in The Vale, Chelsea, tend to be located in crowded conditions in former private houses.

iii) Private schools gave evidence about a lack of accommodation for growth at the public inquiry into proposals to convert to housing the former Jamahiriya School, *and playground*, in Glebe Place, SW3, in 2008. Witnesses for independent junior and secondary schools spoke in favour of keeping the site in education use. Permission was nevertheless given for a change of use to housing.

iv) The Council is not well informed about private education. No officer in the Education Department is responsible for liaison with independent schools and for collecting data.

v) The Core Strategy, though setting out plans for a new Academy in North Kensington (another is under construction in Chelsea) contains no evidence about independent schools or about child and adult use of sports and outdoor recreation activities in the Borough. No surveys of the staff, children, parents and facilities of independent schools are reported.

vi) One possible location for additional sports and recreation facilities could arise when Earl's Court Exhibition is redeveloped (it is relevant that when the Core Strategy refers to the Earl's Court 'place' [Paras 10.4.3. to 6], it mentions plans for 2,100 additional houses but not for sports facilities). Sites for sports centres might be excavated under the Duke of York's running track or under Burtons Field (north of the Royal Hospital) but this would be controversial and problematic. Or, following the example of the Lido within the Seine in Paris, might a sports centre and pool be built on the river side of the Chelsea Embankment? The Society is aware how outlandish such ideas may seem: but they do illustrate the level of innovative thinking that this issue demands.

vii) Over the twenty-year period of the plan an Earl's Court sports centre could be delivered via a S. 106 Agreement. Finance for the other possible sites would be more difficult and would require long-term budget planning.

Proposals

viii) Policy CO1 (p.11 & 165) should specify sports and recreational facilities both indoor and outdoor.

ix) Paragraph 30.3.4 (p.166) should specify local authority schools and independent schools.

x) Policy CK 1 should include a new paragraph committing the Council to providing a new sports and recreation facilities for children and adults in the South of the Borough.

xi) 30.4 Corporate and Partner Actions should include a new paragraph (after Para 8) committing the Director of Planning and the Borough's Children's Services to a) establishing links with independent schools in the Borough, b) collecting data on their spatial and functional needs for education, sports and outdoor recreation and c) delivering additional facilities for both.

Conclusions

xii) The Society considers that the LDF's proposals for protecting existing social and community uses (Policy CK 1) are sound.

xiii) However we believe that Keeping Life Local fails the test of being 'justified' and of being 'effective' in its provision for the spatial and functional needs of independent schools and, in particular, for public sports, swimming, gym and outdoor recreational facilities for children and adults in the south of the Borough. The existing Chelsea Sports Centre in the old Town Hall is insufficient. We have set out above the changes we would like to see.

2. Population increase, population density, traffic congestion and quality of life

i) The LDF's Vision contains (CV1 third bull point – p 11 & 36) a commitment to 'uphold our **residential quality of life** so that we remain the best place in which to live in London...'* The vision then sets out a series of attainable goals but fails to consider the implications of increased population on demand for space.

ii) The Royal Borough already has the highest population density of any local authority in Britain – and the highest domestic property prices (Fig. 5.2). At the same time its fashionability gives rise to intense demand for houses and flats at all price levels. As the Core Strategy says, there is no prospect of meeting such demand.

iii) The London Plan provides the Borough with a housing target. Policy 1.1. in the Plan, a general statement applicable to the whole of Greater London, says that 'Growth and change in London will be managed in order to realise the Mayor's vision for London's sustainable development.....and his commitment to ensuring all Londoners enjoy a good, and improving quality of life...'

iv) The Chelsea Society has grave doubts about the effectiveness of the quality of life claims made by both the Borough Council and the Mayor. How, given the already overstretched capacity of many services in the Borough, and the prospect of 20,000 more residents, will 'residential quality of life' be improved? In the Society's view it is more likely to lead to increased overcrowding on the buses and tubes, longer queues at Post Offices, additional patients at surgeries, additional football players at parks and so on. The Chelsea Society fears that CV 1 will not be effective because it will not be deliverable.

v) Increases in traffic congestion are a related problem. According to Policy CT 1 (b) the Council will 'require it to be demonstrated that development will not result in any material increase in traffic congestion or on-street parking pressure.' But additional residents, even if they do not have cars of their own, will generate traffic in the form of visitors' cars, taxis and services ranging from refuse collection, to plumbers, to lift

* The use of the second person plural in this and other places in the document is ungrammatical and should be changed.

engineers, parcels delivery, building contractors and so on. Policy CT 1 (b) is unsound because it is not effective. The practicality of development without material increase in traffic congestion is not demonstrated. CT 1 (b) is not effective because it will not be deliverable.

vi) It is hard to avoid the conclusion that, given an increase in population of 20,000, a increases in ‘infrastructure’ will be needed. At the expensive end of the scale lies the reconstruction of Earl’s Court (and other Underground Stations) to enable longer trains to be accommodated and to ease the movement of passengers interchanging between the Piccadilly and District lines. (Policy CT 2 (e) on Page 191 says that the Council will ‘require’ this investment. How?) At the lower end of costs for infrastructure could lie the provision of a new sports centre in Earl’s Court.

Conclusions

vii) The Chelsea Society considers that both CV1 and CT 2 are unsound. No evidence has been submitted to show how an extra 20,000 residents is compatible with increased quality of life, residential or otherwise. Nor has evidence been submitted showing how a full range of supporting infrastructure could be supplied. This undermines the effectiveness of the policies.

viii) Furthermore the Mayor’s housing target policy is without spatial logic. It proposes lower ten-year housing targets for such spacious, lower density outer Boroughs as Bromley (5,650 units) and Bexley (3,350) than for the spatially constrained, high density Borough of Kensington and Chelsea (5,850). The Core Strategy seeks to be consistent with this regional policy but the evidence set out above suggests that it would have been more appropriate to propose a departure from it.

ix) It follows that the LDF Vision is unsound. Claims that it will deliver increases in population **and** an improved quality of life are not justified. A future based on low population growth policy should be developed with a view to removing this unsoundness from the Core Strategy

3. The River Thames and Chelsea Embankment

i) The Chelsea riverside and Embankment, coupled with the Royal Hospital and grounds, were designated in the UDP as a ‘site of metropolitan importance’. This extensive space also falls within the Mayor’s Blue Ribbon Network. And although The usability and attractiveness of the Chelsea Embankment is seriously compromised by the noise and danger of heavy traffic (and by cyclists on the footway), it is still a south-facing riverside amenity of the greatest potential. The Core Strategy fails to accord this amenity the importance it deserves.

ii) London Plan Policy 4C.17 requires the Borough to designate a ‘Thames Policy Area’ and, in an annexe, identifies boundaries for it. Policy 4C.18 requires Boroughs to collaborate in preparing appraisals of their stretches of the Thames.

iii) The Core Strategy omits a) to identify a Thames Policy Area, b) to address its needs, c) to define policies for controlling development in it and d) to make proposals for river-related facilities.

iv) The Strategy does refer to the riverside in Policy CL1 (d) which requires Thames-side development to enhance its waterside setting; Policy CE2 covers areas at risk from flooding; Policy CE2 (2) covers the construction of a Tideway sewage tunnel and the safeguarding of Cremorne Wharf; and Policy CE4 (c) covers the conservation importance of the Blue Ribbon Network.

v) The Chelsea Society believes that the Core Strategy is unsound because it does not define a Thames Policy Area, set out policies for its protection (including traffic management) or consider ways in which greater use and enjoyment might be drawn from the Thames. For these reasons the Strategy fails the test of soundness.

Conclusions

vi) The Core Strategy should be modified to contain a new Chapter 15 A devoted to a 'place' called 'Chelsea's Riverside'. This should set out a Thames Policy Area and all existing references to the river should be pulled together in this new chapter.

vii) Chelsea's Riverside should be mentioned in Para 2.3.5/18; in Chapter 3 between 3.1.10 and 3.1.11; in the final paragraph of CV1 and its 'Key Diagram' opposite Page 36. A new Strategic Objective will be needed for the Borough's blue (and possibly green) outdoor amenities.

viii) Thames Policy Area issues that need addressing include:

- a) The protection of views and vistas along and across the river, from the bridges and from the Embankment.
- b) The appropriate use of the South Grounds of the Royal Hospital.
- c) The management of motor traffic to reduce the barrier it creates between residential Chelsea and the River – including consideration of a short length of road tunnel. (It is essential to start debating the idea of a short stretch of tunnel – even if it takes 30 years to achieve it.)
- d) Control of development associated with the Thames sewage tunnel during construction and any structures that remain following its completion.
- e) Managing the development of Cadogan Pier, pontoons and moorings.
- f) Reducing conflicts between pedestrians and cyclists on the Embankment footpath.
- g) Improving the quality of design amongst the houseboats.
- h) Completion of the Thames Path west of the houseboats and across Chelsea Creek.
- i) The future of Cremorne Wharf.
- j) The enhancement of Chelsea Creek, its extension into Imperial Wharf and towards the King's Road and the creation of a greenway between the river and Fulham Road.

4. The green and blue amenities of Kensington and Chelsea – their strategic importance

i) It goes well beyond the remit of the Chelsea Society but the Inspector is urged to consider more widely the case for combining, as spatial elements that merit protection and enhancement, not just Chelsea's Riverside but also the Grand Union Canal, Kensal and Brompton Cemeteries, Holland Park and the Borough's garden squares. Surely these are blue and green amenities of strategic importance?

ii) The Borough's parks and squares plus the Chelsea Embankment with its suspension bridges and green backdrop in Battersea Park, are powerful elements in the character of Kensington and Chelsea. The Core Strategy does not do them justice. Their spatial significance needs to be identified and spelt out at all appropriate points in the plan.

Appendix. The test of 'soundness'

The purpose of the Examination is to establish whether or not the Core Strategy is sound as set out in the Planning and Compulsory Purchase Act 2004. The tests are:

- a) Are its contents justified?
 - i) Are they based on evidence drawn from consulting residents and/or on research?
 - ii) Are its strategies, when compared with other options, appropriate?

- b) Are the contents of the strategy effective – meaning deliverable?
 - i) Can any proposed infrastructure be provided?
 - ii) Would any regulations or national plans bar such delivery?
 - iii) Are there conflicts between K&C strategies and those of neighbouring boroughs?

- c) Is the strategy consistent with national or regional policy?
 - i) If there are any departures are they justified?
 - ii) Or should any policies be added that would depart from national or regional policy in order to meet local needs? If so:
 - a) How is the Core Strategy unsound without them?
 - b) If the Strategy is unsound without them, what should it say?

- d) The Chelsea Society's observations are based on this set of tests.

TB
8 June 2010