

Matter 7 – Fostering Vitality

- 1 *Policy CF1, criterion (e) supports the establishment of a new centre at Earl's Court, specifying a neighbourhood centre. Is there evidence to support a more general indication of the order of centre?*

The neighbourhood centre designation for Earls Court is unsound unless the policy refers to the provision of social and community facilities and local shopping facilities and is clear about the definition and description of a neighbourhood centre.

Warwick Road, in particular, has a lack of local neighbourhood shops, so residents have to travel to other parts of Earls Court which involves crossing a dual carriageway. There is a need for affordable shops, which also meet local employment needs, throughout Earls Court.

Neighbourhood centres are so important, as too often the higher order centres don't function for local people; they are mainly for tourists and those who work there. Portobello is an exception.

The changes we are seeking are:

- Earls Court neighbourhood centre to meet the day to day needs of the residents of the area for local shopping and social and community facilities.
 - a general reference to neighbourhood centres in Policy CF1, not only Earls Court but the neighbourhood centres listed in paras 31.3.12 and 31.3.13
- 2 *The affordable retail units in Policy CF2 is intended to ensure the continued supply of small units more likely to be occupied by start-up, independent or specialist traders, managed under the Council's Neighbourhood Shopping Policy. If implemented, would this lead to adverse effects on retail occupation making its objective ineffective and undeliverable?*

We strongly support the aspirations in CF2, which follow the evidence and recommendations of the Retail Commission Report, and are in conformity with draft replacement London Plan Policy 4.9. The principle is the same as developer contributions to affordable housing units.

However, implementation has proved difficult. Therefore, we propose a number of changes to strengthen the policy:-

- Defining affordability, specifying the rent element and ensuring perpetuity.

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- Ensuring that this policy is not limited to the very large retail developments and that a wide range of schemes contribute to affordable shops
- Enabling the receipt of financial contributions to be used to strengthen neighbourhood centres to offset the impact of major developments, this to include securing the units to retain vital local services such as post offices.

Affordable rents are crucial to support local businesses and keep areas local. A key principle is to have a relationship with the local economy, and local management of these units is important. In Golborne, they control rents through their control of the freehold.

CF3 d) on the protection of shops within neighbourhood centres should exclude change of use to estate agents, bureau de changes or hot food takeaway to give the same level of protection as for higher order centres.

- 4 *Policy CF5 emphasises the protection of offices within town centres, but not at the expense of existing town centre occupiers who are in need of expansion. Is the emphasis too great and does CF5 provide sufficient flexibility to allow for the needs of other town centre uses?*

The emphasis on office use is too great. Housing is the biggest need, and there should be flats above shops (as in Golborne) and attention to those shops/ offices that stand empty due to the commercial rents policy.

CK5 should specify office space for social enterprises and voluntary sector premises. The definition in 31.3.27 needs to change to reflect this. We support the restriction on amalgamation.

- 5 *The Council is seeking to protect hotels across the Borough except in Earl's Court Ward. Policy CF8, criterion (a), which gives effect to this, is supported by para 31.3.48 citing problems caused by poorly run hotels and a concentration of hotels in residential areas. Is the loss of hotel bedrooms in Earl's Court Ward supported by substantive evidence of problems?*

Earls Court should remain an exception to the hotels policy, and some of the hotels here should be turned into housing. Evidence includes the concentration of hotels in Penwyn Road, Warwick Road and Cromwell Road.

6 Any other relevant issues.

CO2 refers to fostering cultural and creative as well as commercial uses, but the only reference in the policies that follow is to the South Kensington Strategic Cultural Area.

The change we are seeking is support for local artists and community arts.

Matter 8 – Better Travel Choices & An Engaging Public Realm

- 1 *Chapter 32, para 32.3.9 and Policy CT1, criterion (i), emphasises the importance of improving the north-south links across the Borough. How will this be achieved, and will there be consequences for the built heritage and the objective of renewing the legacy?*

Paragraphs 32.4.4 and 32.4.5 do not provide evidence that i) can be achieved. To make the policy sound, Chapter 32 should refer to proposals within the Mayor's Transport Strategy (2010) and the Local Implementation Plan.

The policy is not sufficiently locally distinctive. There should be stronger reference in Policy CT1 to the need for better accessible public transport links in the north of the borough. The proposed North Kensington Academy needs to be based on improved transport in the area. Buses C3, 31 and 390 are evidence of buses that fail to connect north and south.

The Inclusive Report cites poor connecting services from the North to other parts of the Borough, particularly the South including some hospitals. Members report simply not going to the South as they feel it is too far and too time consuming with no direct means of transport. Members with physical impairments report the difficulty in walking the long distances involved between bus stops. The poor connectivity is highlighted by the largely inaccessible tube system. We seek further and specific discussion of this under 4.

- 2 *Criterion (b) of Policy CT1 requires that new development should not result in any material increase in traffic congestion or on-street parking pressure whilst (c) requires that additional new residential development should be permit-free. Is the Policy, as drafted, unduly restrictive and contrary to national guidance?*

We support the proposed restrictions and seek a further restriction on underground car parks which continue to be developed in the borough and are not mentioned in the policy.

- 3 *Para 32.3.10 has additional text referring to opportunities to provide cycle and pedestrian links within new developments along the western boundary of the Borough. Should an additional criterion be included within Policy CT1 requiring such provision in new developments?*

There is a need for safe and separate cycle paths to be included in Policy CT1. It is very dangerous to cycle in the borough and without safe cycle paths the policy of encouraging people to use bicycles instead of cars will not work.

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The changes we are seeking are dedicated cycle paths (not just a reference to cycle routes) and a map of the cycle routes/paths.

4 Any other relevant matters.

We seek a discussion (and policy change) concerning disabled people's access to public transport.

Nearly half of the respondents to the survey [the Inclusive Report] considered transport to be the most important factor to achieving independence. Despite the introduction of low floor buses and the installation of lifts at some underground stations, many disabled people still face difficulties in using London's public transport system. (page 13 of **Inclusive Report**)

Investment in community transport is much needed. The Dial -a-ride service continues to be very poor as evidenced by reports from the London Assembly. Neither are mentioned in the Core Strategy.

Policy CT1 j) aims to complete step free access by 2028. 2028 is too late-creating an accessible transport system should be a priority for both the Royal Borough so that disabled people have the same choice, freedom and control as non-disabled people. Evidence and recommendations from the 'Inclusive' document highlight this.

The Infrastructure Chapter gives tables for implementation and says that step free access at South Kensington will be achieved in 2010 through developer contributions (page 253) and at Latimer (Ladbroke Grove) by 2012 through TfL (page 246). We suspect this information is out of date and that the deliverability of this very important policy is in question.

The change we seek is for the implementation strategy to include a real commitment to the delivery of step free access.

Matter 10 – Diversity of Housing

- 1 *The Council is seeking to ensure new development is provided so as to further refine the grain of the mix of housing across the Borough and Policy CH2(a) includes a requirement for a mix of house sizes. Should the Policy require a higher proportion of family sized units to meet the need identified by the Housing Assessment?*

The policy is unsound as it fails to provide the strong steer towards family housing (3, 4, and 5 bed) required by the Strategic Market Housing Assessment (SHMA). There is a major unmet need for more family housing in the social rented housing sector, and the Stock Options Review 2009 shows that the majority of new housing in the borough is 2 bed. There is severe overcrowding at Wornington Green, yet redevelopment seeks to increase 1 and 2 bed provision. The SHMA recommends 50% of new affordable housing to be large 3 and 4 bedroom properties.

The change we are seeking is for a policy supporting family housing in the social rented sector, based on 3 bed 35%, 4 bed 20% and 5 bed 10%.

- 2 *Criterion (b) requires residential developments, including conversions, etc., to meet standards on floorspace and floor to ceiling heights, although neither the Policy, nor para 35.3.12 specifies the standards. Is there evidence to support the requirement for such standards, where can the standards be found, and how will they be applied in practice?*

Policy CH2 b) is unsound as no standards are identified. Living space standards must be improved, in line with the Mayor's Housing Design Guide, and should be to at least Parker Morris standards.

Space standards are important so that there is dining space for families to eat together, study space to help with children's educational development and they also help ease overcrowding.

The change we are seeking is that the Core Strategy should follow the housing quality and design principles in Draft Replacement London Plan Policy 3.5 and the minimum space standards in the accompanying Table 3.3. This should include taking account of storage space, dining space and quiet areas within homes and taking account of the needs of children and older people.

- 3 *The affordable housing requirement is stated in CH2(i) as being at least 50% provision on a gross floorspace in excess of 800sm. Can this requirement be justified in the context of national, PPS3, and London Plan policies?*

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- 4 *The basis for calculating the requirement for affordable housing is focussed on floorspace rather number of units. Is the basis for the calculation, and the consequent thresholds, justified by evidence?*

We support the use of floorspace thresh-holds to achieve the policy aim of the maximum amount of affordable housing. Developers have sought to abuse the thresh-hold based on the number of housing units, by greatly increasing the size of the units whilst staying under the 10 unit thresh-hold. There is a high need for affordable housing and high property values enable this affordable housing contribution to be provided.

50% of the new housing should be affordable. This is supported by the SHMA and the London Plan 2008.

We provide further evidence in our original submission.

- 5 *Policy CH3 provides protection for market residential use, except in certain locations and circumstances, including higher order town centres, employment zones and predominantly commercial mews. Is the Policy unduly restrictive - rather, should there be a more general presumption in favour of residential development?*

Policy CH3 is unsound, as it prioritises other uses over housing. We support more housing and especially more social rented housing, as the key strategic priority for the borough, and it follows from this that less large retail and office uses should be permitted. There should also be protection for amenities and community provision as part of residential development to ensure successful, sustainable communities.

- 6 *Policy CH3 has been amended by deleting criterion (c) but retains criterion (b), resisting the net loss of affordable housing floorspace and units throughout the Borough. Does CH3(b) give sufficient protection to social rented housing?*

The policy is unsound, as social rented housing is not protected. Wornington Green is evidence that more protection is needed. The increasing restrictions on access to social housing, the high level of rent in the private sector and new restrictions on Housing Benefit will force poorer people out of the borough unless there is more protection.

Intermediate housing is not affordable, and therefore not an option, for the vast majority of those in housing need. The SHMA finds that whilst 14% of affordable housing could be intermediate, three-quarters of the intermediate requirement needed to be for intermediate rented housing.

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The change we are seeking is for Policy CH3 b) to resist the loss of social rented housing, unless it is replaced, at an equal or greater floorspace, on the same site or within the immediate vicinity.

Off site provision of social rented housing is an issue, increasing the segregation between private housing in the south and affordable housing in the north. Therefore, we also seek a change to Policy CH2 so that any off-site social rented housing should be provided within the vicinity of the market housing development.

7 *Policy CH4 seeks to ensure that the long term benefits of estate renewal outweigh the consequences for residents. Does implementation of the Policy carry with it the potential disintegration of existing communities?*

The policy is unsound as it relies on the disintegration of existing communities. This is evidenced by Wornington Green where the development has been marked by poor communication with existing residents, allocations not meeting need, a lack of 3 and 4 bed housing to address over-crowding, and families being broken up. Estate renewal should guarantee new replacement housing for tenants and their household, and not restrict to the person named on the tenancy agreement.

Estate renewal must not only address, as a priority, the overcrowding of those living on the estate at the time of the development proposal but provide housing for family members (children and relatives) who had to leave because of this very overcrowding. This is an example of how estate renewal could benefit the existing community.

The planned demolition of Verity Close in the North of the Borough (off Lancaster Road) is a further example. To make room for the Academy, it is intended to demolish Verity Close and rehouse people. Verity Close contains good accessible properties, where adaptations have been made to several ground floor flats. Demolishing these homes means losing accessible housing, in a Borough that has a severe shortage of accessible housing stock. It means ripping apart communities and creating uncertainty for many residents both disabled and non-disabled but more so for disabled people who cannot be guaranteed new accessible properties. There has also been a lack of consultation on this proposal.

The changes we are seeking are:-

There must be a compelling case for demolition that demonstrates benefits to existing residents as well as other stakeholders,

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There should be a guaranteed right to return of existing tenants and their household to rebuilt homes on the estate (if they wish) and this guarantee should extend to leaseholders who bought their homes.

8 Any other relevant issues.

Policy CH2 c) encourages extra care housing, but is unsound as there are no standards or targets and provision is limited to the south of the borough. The evidence is that this exacerbates the current trend which is for care homes in the north of the borough to be demolished and not replaced. An example was Edenham Nursing Home, by Trellick Tower, (the last residential nursing home in the north of the borough with some dementia beds) which was replaced with a car and bus park after demolition.

The evidence is that sheltered and supported housing, including extra care provision for the frail elderly, is not being developed. Two recent reports (quoted in the SHMA) recommend an increase in the provision of supported accommodation for older people and a review of the fitness of the Borough's sheltered housing stock.

"Older People's Housing Needs" says "to date, planning strategy has not taken into account the needs of older residents."

The change we are seeking is:-

The protection of existing sheltered housing schemes and the development of new care homes and extra care housing to be located where there is need

There is an absence of policy on accessible housing, and the minimum standards for wheelchair accessible and lifetime homes housing are inadequate. Because of the nature of the housing stock in the borough (i.e. older, flatted blocks) there is a serious lack of fully accessible housing, resulting in some disabled people being, to all intents and purposes, trapped in their own inaccessible homes" (as highlighted in ADKC's Inclusive report).

Accessible housing is a particular issue for wheelchairs users. This will escalate with an increasingly aged population. ADKC's Membership Survey found 16% of respondents unable to move around independently in their own homes due to the structural unsuitability of accommodation and/or the lack of suitable mobility aids.

According to the Council's draft 'Housing Review for Physically Disabled people', "there is a lack of supported housing projects or newly commissioned properties specifically for people with a disability despite physically disabled people being the predominant care group needing additional support".

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In our original submission, we referred to the need for an access statement to underpin the focus on adaptability and lifetime homes. We also referred to the importance of access for disabled people regarding voluntary and community sector premises.

The changes we are seeking are:

- The Core Strategy should include include a statement on accessibility for all and reflect the Social Model of Disability.
- Adapted properties should be ring-fenced for disabled people.
- There should be a commitment to exceeding minimum requirements in creating Lifetime Homes.
- The RBKC Supplementary Planning Document Access Design Guide should be referred to in the Core Strategy