

Written statement Kensington and Chelsea Social Council REP/197185/4

Matter 1 – Vision and Objectives

- 1 *Chapter 2 identifies the issues and problems facing the Borough and provides a Spatial Portrait which, it is suggested, drive the direction of the Core Strategy. Four components and five strategic issues are identified. Do the Vision and Strategic Objectives address these components and issues, and is it the most appropriate approach?*

We agree with Core Strategy paragraphs 2.33, 2.3.12 and the amended 3.1.6. It is the failure of the Vision to address these issues of deprivation that makes it unsound.

The Vision does not address health inequality which is marked between the north and south of the borough, despite these health issues being an important component of the Community Strategy. In the north of the borough, men live 12 year shorter lives than men in the south and are much more likely to suffer life limiting illnesses The level of reported poor health in Golborne ward is the fifth highest in London. On one estate in the north, Swinbrook, income level hits poverty levels as 40% of the male population are on DLA.

According to the Index of Multiple Deprivation 2004 Golborne and St Charles' contain areas which are amongst the 10% most income deprived in England, while six wards – Notting Barns, Colville, Norland, Holland and Cremorne contain areas that are in the 20% most income deprived. There are high levels of child poverty in some wards within Kensington & Chelsea.

There should be emphasis on the social determinants of health to align with national strategy. We refer to Marmot, M. (2009) *Strategic Review of Health Inequalities in England post-2010 Marmot Review: First Phase Report*, University College London

Particular concern is expressed at the lack of understanding and co-ordination between public health and the planning system, despite the fact that planning has a major impact on health. There should be reference to the use of a 'health map model' that uses a public health approach to assist with urban planning.

The change we are seeking is for the Vision to tackle the issue of inequality in health outcomes. The strategic objectives should ensure that the health inequalities impact of development is taken into account, following the Mayor of London's Best Practice Guidance on Health Issues in Planning, including the use of Health Impact Assessments and the importance of working with the voluntary and community sector. KCSC should be listed as a partner in the delivery sections of the Strategy.

Concerns are raised by equalities groups that the needs of their communities are not specifically recognised in the Vision and throughout the Strategy.

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The Index of Multiple Deprivation referred to in Core Strategy paragraphs 2.2.7 and 2.3.3 includes disability, but there are no proposals either in the Vision or the Strategic Objectives to address disability issues.

The report *Inclusive Kensington and Chelsea* report, produced by Action Disability and endorsed by the Local Strategic Partnership, aims to ensure that high quality access and inclusion become an overarching theme in planning policy.

70% of the borough is conservation areas. Most of the buildings in the conservation areas are Victorian – tall, narrow, multi-floor premises, the majority with staircase entry. As well as residential houses and flats, this type of property also houses public facilities such as GP surgeries. Many of these buildings present formidable disability access problems.

The Vision and the Strategic Objectives should be changed to i:-

- champion inclusive design in all new developments and refurbishments
- make access statements a requirement
- support the goal of independent living in housing provision
- address the current large gap in disabled access to public transport

On housing, current policy is to place all affordable housing in the north of the borough thereby increasing the inequality gap. There is no reference to this in the Vision.

The change we are seeking is a balanced approach to social housing provision throughout the borough, with a commitment to affordable housing being also developed in the south.

On transport, the Vision should be changed to include plans to connect estates in the North, to overcome the isolation of Kensal, Delgarno and Lancaster West and to recognise that the absence of step free access at the tube stations is a considerable barrier to mobility, as it means many people cannot use the tube at all.

A significant problem is access to the hospitals in the south of the borough, world class but very difficult to access for those living in the north of the borough.

The Vision should also be changed to recognise the importance of social and community uses and the role of the voluntary and community sector as a valued partner.

This position statement will inform our response to the other questions in Matter 1.

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Matter 3 – Policies for Places: Specific

7 *Earl's Court:*

Has consideration been given to the sustainability of the local residential community?

NO - We rely on the detail provided in our original submission. To make the plan sound, we seek the following changes to Policy CV 10:

Reference to providing affordable housing, social and community uses, affordable leisure facilities, affordable workspace for small businesses and specific reference to a community centre and swimming pool.

Should there be a reference to the importance of the Warwick Road Corridor?

YES - the Warwick Road Corridor needs transport improvements because of the primary school newly located here.

The new primary school on the Warwick Road site is bounded by two main roads, extremely hazardous for pedestrians and cyclists. The development has a linear park built in so children from the new houses will get to school very safely, but children from other areas nearby will have to cross a very fast road, which is always full of traffic day and night.

Latimer and North Kensington Sports Centre:

Does the Vision ignore affordable housing and associated infrastructure?

YES – We rely on, and will be referring to, our original submission.

We seek evidence to be made available to the examination on the Notting Barns South Masterplan 2009 and also on whether capital funding for the Academy is secure (given public spending cuts).

To make the plan sound, the vision for Latimer (CV 9) should refer to social housing, local amenities catering for all age groups and all publicly accessible and requirement of an access assessment for the school and leisure centre.

Is the proposal for a new shopping centre at Latimer Road Station unsound?

YES – We rely on, and will be referring to, our original submission.

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To make the plan sound, CV 9 should support the provision of local shops throughout the area, with affordable rents.

Should there be reference to improved transport and community safety?

YES – We rely on, and will be referring to, our original submission.

To make the plan sound, CV 9 should refer to pedestrian and cycle access as well as improvements to public transport and community safety.

Matter 4 – Keeping Life Local

- 1 *The emphasis in Chapter 30 appears to be on protecting and enhancing the present social and community facilities with the key role of the planning system identified as protecting uses that have lower land values, but high values to the community. Should more account be taken of the need for social and community infrastructure to meet the needs of increased population?*

YES – With planned population increases, there is a need for more community premises and other social infrastructure. These should be located spatially in accordance with those parts of the borough where the population is planned to increase significantly. Such as Kensal, Earls Court, Latimer, and Wornington Green. The diversity of the borough and the community needs which flow from this should also be recognised in meeting population needs.

- 2 *Policy CK1 protects social and community land and buildings for re-use for the same, similar or related uses. Should the Policy provide flexibility for the relocation of uses through 'use swaps'?*

There are plenty of empty properties in different use classes, which community organisations could use, but which stay empty because of a lack of flexibility about their commercial value. For example:-

- Old MIAC offices in Golborne road
- Old children's home n Basset road
- Empty shop fronts in Kensington high street and Portobello road

To make the plan sound we are seeking a policy on this as part of CK1. A successful town centre or neighbourhood centre is one which contains a diverse mix of uses, including social and community use, and there should be planning tools to enable social and community use of properties which have been empty for a considerable period of time

Policy CK1 also needs to be consistent with Policy CF3.

- 3 *Policy CK1(c) applies a sequential approach to the protection of land or buildings currently or last used for a social or community use. It is proposed as a pragmatic approach to allowing necessary changes whilst maintaining the overall stock of such uses. Is the sequential approach too restrictive, hindering redevelopment proposals?*

NO – CK1 should be strengthened and should refer specifically to the protection and enhancement of community premises. Otherwise, there is the risk that community premises will be lost and replaced by other community uses.

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The policy does not conform with London Plan policy and PPS12. We refer to our original submission and provide the following examples as evidence:

In the last 2 years, 2 churches have evicted community users in order to refurbish their premises and then have let the premises to private schools. There are also a number of public buildings in the north, namely the Camden Institute and the village hall behind shops in Ladbroke Grove now being let to a large and multi branched private school. Church halls and parks are used as overspill and playgrounds for these schools. Expansion of Canalside House was halted and groups waiting for the new offices promised are still either operating from home or sharing unsuitable premises with other groups.

Several advice agencies in the borough are in need of premises:-

Nucleus, NKLC and WENAC and Chelsea CAB are all very cramped and in need of extra space and there is none.

The North Kensington Law Centre which operates out of 74 Golborne Road, has premises which are too small and in need of refit.

There is only Thorpe Close/Westway Development Trust offices or Canalside House, both of which have waiting lists for voluntary sector space. There are very few locations in the south.

Midaye Somali Development Organisation, currently based at 7 Thorpe Close, have outgrown their office space and face barriers to running larger health projects and other activities that require space and privacy. They have predominantly Somali Women users, many of whom are elderly and their office is only accessible via a step staircase.

There are also small organisations such as the Kensington & Chelsea Mental Health Carers Association which has over 150 users and has to share a small office at Canalside House. They only have access on Thursday afternoons and Saturday afternoons, they have been waiting for five years for a suitable office.

To make the policy sound we refer to the proposals in our original submission.

- 4 *The Council is concerned with retaining local shopping facilities and enabling better access to them and Policy CK2 seeks to ensure that opportunities exist for convenience shopping throughout the Borough. At the same time Policy CF1 seeks to control the location of new shop uses on a 'town centre first' basis. Is this a source of potential policy conflict and is Policy CK2 strong enough to provide adequate protection for local facilities?*

NO – Policy CK2 is not strong enough. We rely on our original submission the Retail Commission evidence base document and draft replacement London Plan policies 4.8 and 4.9.

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To make the plan sound, there should be a much more comprehensive Policy CK2, drawing on other parts of the Core Strategy the recommendations of the Retail Commission and London Plan policy.

- 5 *Having local neighbourhood facilities within a short walking distance is seen as an essential characteristic of local life and it is suggested that existing facilities need protecting. Policy CK3 indicates that policies CK1 and C1 provide the policy mechanisms for delivery. Should CK3 be more explicit in the actions required to give support to walkable neighbourhoods?*

YES – we rely on our original submission.

Matter 5 – Strategic Sites Allocations: Kensal Gasworks and Wornington Green

Kensal Gasworks Strategic Site Allocation:

- 1 *In order for the Kensal Gasworks SSA to act as a catalyst for regeneration of the north of the Borough a new Crossrail station is required but is not provided for by the Crossrail Act. How secure is the delivery of the Crossrail station?*

Deliverability hinges on a Crossrail station and this is unlikely to happen. The EiP of the Draft Replacement London Plan explicitly declined to make any commitment to a Crossrail station, other than that this is being explored.

- 2 *The delivery implications of not achieving a Crossrail station, shown in Chapter 39, suggest that there would be a significant shortfall in the amount of housing development on the SSA. What would be the impact on the development of the SSA and consequently on the Core Strategy as a whole?*

There is a major need for housing development at Kensal. Options within the feasibility study show that the draft replacement London Plan target of 2,000 homes can be achieved without Crossrail, and including significant provision of family housing.

- 3 *The potential alternative (Plan B) to the Crossrail station is to improve local accessibility through bus based improvements and off-site rail improvements. Has adequate research been undertaken to show that these alternatives are deliverable and would support achievement of the Strategy?*

NO - An alternative plan is needed which is not dependent on Crossrail, but this is not on the table because the Council await a Crossrail decision. This failure to develop options into alternative plans is unsound.

- 6 *The Kensal Gasworks SSA would provide a significant proportion of the total affordable housing for the Borough as a whole. What impact would a reduced quantity of housing have on the affordable housing requirement?*

The plan is unsound as the implications for affordable of not having Crossrail have not been sufficiently considered in the evidence base.

- 7 *The draft replacement London Plan contains a new proposal for Kensal Canalside as an Opportunity Area having 'significant development potential' but requiring 'the resolution of a number of*

challenges and constraints'. Is the Opportunity Area deliverable within the Plan period?

- 8 *The Strategy proposes that the development should balance social benefit and economic value, including 10,000m² of new offices. Has employment been given too low a priority?*

The guidelines for Kensal Canalside Opportunity Area are insufficient and undeliverable. We rely on our original submission regarding the low priority given to employment.

There needs to be a higher level of public participation and scrutiny into the development plan for Kensal than has taken place hitherto. To make the plan sound, we seek a change whereby there will be an Area Action Plan for Kensal, so that there is a public examination of the planning framework before this is adopted.

Wornington Green Strategic Site Allocation:

- 9 *The post-war estate currently houses approximately 1,700 residents in 538 flats. The proposal is to replace these with a minimum of 538 affordable units and a minimum of 150 private dwellings. There are two relevant questions. Does the Allocation provide sufficient flexibility to ensure delivery, and is the acknowledged disruption during construction and the upheaval to local residents' lives justified?*

There is no justification for the upheaval to local residents lives.

Wornington Green Estate is a good example of a diverse community which rubs along together well. It includes a large proportion of African-Caribbean families, many now into their third generation. Muslims, mainly from Morocco, make up a third of all residents, and also have extended families and close local networks. Residents feel safe (crime is very low), they know their community. Very, very few residents wish to move.

For many, the total demolition and rebuilding of the estate is a frightening prospect that they do not believe will improve their lives. Older residents are particularly worried, made worse by the speed with which this has happened. Many residents from the various ethnic groups believe the intention is to design out their communities.

There is the risk of partly demolished buildings being left for some years, of amenity open space being eaten up by the development and the remainder of the park being noisy, dirty and unattractive for the 10-15 years of the development. There is the further risk of residents decanted in the first phase being unable to return.

Residents do not know where they are moving to and when. The situation

keeps changing and at a recent meeting with residents in June 2010 it became obvious that there are gaps in the allocations for phase 1. The landlord invested in consultants First Call to communicate their plans better with the residents, but they have not invested in any support and counselling services to help people with the trauma of moving home.

The main reasons given for the upheaval are to address overcrowding on the estate and to bring in funding. (Over 64% of the population are families with mainly dependent children and up to a quarter of all households are overcrowded). These problems have been well known and developed over the last 10 years without any action being taken. Most significant is that the amount of family housing (3 and 4 bed) has actually decreased in the masterplan, compared with current provision.

If this was a regeneration of the estate then you would expect 100% of the new housing to be social housing. This is the housing need and it would show respect for the existing community. With the change in tenure, the increase in density and the displacement, this should be described as redevelopment, not regeneration.

We refer as evidence to our original submission and to the Minority Report from Cllr Judith Blakeman. We are seeking to call local cllrs as witnesses.

10 *Initial urban design studies suggest the site is capable of accommodating higher densities than the present proposal would achieve. As a consequence is there a case for an increase in the amount of social housing and community facilities to be provided?*

Despite the increased density and population growth arising from the current proposals, no evidence has been presented that public transport, and social infrastructure will be strengthened to cater for this. The only debate has been about replacing the existing provision.

The urban design leaves the community worse off in terms of open space provision, with no front gardens and the loss of spacious green spaces and the majority of mature trees.

The changes we are seeking to make the plan sound are:

- A much higher amount of affordable family housing
- the provision of additional voluntary sector premises, community facilities and open space
- a thresh-hold (applicable to all regeneration/ estate renewal schemes) which provides a quantity of community facilities and open space per head of population.

Matter 6 – Strategic Sites Allocations: Earl’s Court

- 1 *Earlier drafts of the Core Strategy referred to Earl’s Court Town Centre, whilst the Allocation now refers to a Neighbourhood Centre designation within the Earl’s Court Opportunity Area whilst Policy CA7 indicates ‘small scale retail uses to serve day-to-day needs of the new development’. Is there evidence to support the range and type of uses associated with a new centre?*

To make the plan sound, there should be reference to the needs of the existing residential community. We support small scale retail uses, and there should be specific reference to affordable workspace. Policy CA7 should be consistent with Policy CV 10 and in conformity with the strategic guidelines for the Earls Court and West Kensington Opportunity Area set out in the draft replacement London Plan.

Reference to providing affordable housing, social and community uses, affordable leisure facilities, affordable workspace for small businesses and specific reference to a community centre and swimming pool.

- 2 *Chapter 26 makes it clear that the Site Allocation has considerable potential as part of a wider mixed-use Earl’s Court Regeneration Area. A joint Supplementary Planning Document (with the adjacent authority) is proposed to consider the full development capacity and disposition of uses. Does Policy CA7 provide sufficient flexibility in respect of the amount of residential development; the amount of office floorspace; and the prescriptive requirement for a cultural facility of at least national significance?*

To make the plan sound, the option should be included of affordable housing and social and community uses. The requirement for a cultural facility must take account of the needs of local black and ethnic minority groups.