

From: Clive Wilson

To: Tollitt, Penelope: PC-Plan; Mcdonald, David: PC-Plan; Wade, Jonathan: PC-Plan

Cc: Georgie Gibbs ; Nonie ; tiffany ogden ; libby symon ; Amanda Frame ; Bach, Michael; Cllr-Mills; Cllr-Lindsay

Sent: Thu Dec 10 17:08:52 2009

Subject: Core Strategy: comment on Pre-publication Version
For the attention of Mrs Tollitt, Head of Policy and Design

We have now had an opportunity to consider the Pre-publication version of the Core Strategy DPD.

In our view, the Strategic Objectives set out in Section 3.3, and the results of the Vision set out in Section 3.4, contain a potential conflict which is not addressed, let alone resolved. In Royal Crescent and St Ann's Villas, we are not convinced that the legacy objective can be achieved / delivered at the same time as improving north-south public transport (unless some way is found to reduce the volumes using these roads. The HGV/buses problem is already unbearable. The Core Strategy therefore fails the 'effectiveness' soundness test.

The Core Strategy places great emphasis on improving north-south transport links.

Equally, it emphasises the importance of protecting the high quality historic environment, and specifically Listed Buildings and Conservation Areas, in order to "pass on the legacy".

In our current Survey work for updating the Norland Conservation Area Policy Statement, a critical issue is highlighted for the future of Royal Crescent as a Grade II* crescent, and St Ann's Villas (Grade II). I attach the main part of the survey we have carried out of Royal Crescent. This highlights the major problem of HGV (and particularly bus) traffic, which threatens to imperil all the good Conservation work that has been done over the past 30 years to pull Royal Crescent and St Ann's Villas out of the bad old days of Rachman-style multiple occupancy.

(It is worth noting that this traffic problem was highlighted and covered at some length in the Norland CAPS of 1982. The recommended actions were not pursued.)

Clearly a key part of our Vision for Norland, and specifically Royal Crescent and St Ann's Villas, will be to reduce the volume of this traffic to "liveable" proportions, so that these Grade II* and Grade II buildings remain desirable places to live in, preserve and enhance. (One of the results aimed for under Renewing the Legacy is that "property owners will be accustomed to undertaking restoration and enhancement works as part of development proposals". This will not happen if people no longer want to live there.)

Given the small number of possible north-south routes, and the main focus of the Core Strategy on regeneration of North Kensington, there seems every possibility that the importance of protecting and enhancing the high-quality historic environment in RC and St AV will go by default.

Nowhere does the Core Strategy indicate how the objectives of improving north-south transport links, and at the same time, protecting and enhancing Conservation Areas and Listed Buildings can be achieved in the case of Royal Crescent and St Ann's Villas.

Relating this problem to relevant sections of the Core Strategy:

Strategic Objective Three: Better travel choices is to be achieved by, amongst other things, **improving bus services linking the north and south of the Borough** (para 3.4.11)

At the same time, **Strategic Objective Five: Renewing the Legacy** (para 3.3.13 and CO 1.5) is assumed to have been achieved in para 3.4.14:

“we will have renewed the legacy:

- the quality of our built heritage will continue to be central to the image of the Borough
- property owners will be accustomed to undertaking restoration and enhancement works as part of development proposals”

and in para 3.4.18:

“we will have renewed the legacy:

- our historic townscapes will have been cherished and will appear much as they do today
- our listed buildings will have been preserved”

It does not say how.

We maintain that in relation to Royal Crescent and St Ann’s Villas, the Legacy will not be renewed if the Buses/HGV problem is not addressed and resolved. How the conflict is to be resolved, and both objectives achieved, is not addressed in the Core Strategy document. We therefore maintain it does not pass the “Effectiveness” test.

Please could you ensure that this objection is brought to the attention of the powers-that-be? Better still, could the problem not be addressed in the Pre-publication version before it goes any further?

Yours sincerely

Clive Wilson

Chairman
Norland Conservation Society