

**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](mailto: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 10<sup>th</sup> December 2009**

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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

	<b>Yes</b>	<b>No</b>
<b>Do you consider the core strategy to be legally compliant?</b>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Do you consider the core strategy to be Sound?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*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.

The Association welcomes many of the changes that have been made to the previous draft Core Strategy and is grateful that many of its comments have been taken into account.

**Please attach additional pages as required**

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

<b>Justified</b>	<b>Effective</b>	<b>Consistent with national policy</b>
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

*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.

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

**Chapter 12 South Kensington**

The chapter as drafted will not be effective in that the Vision CV12 (para 12.2), the Priorities for Action (para

12.3.12), the Policy CP11 and the monitoring section (para 12.4.7) fail to reflect the balance of priorities contained in the Vision for the Core Strategy as a whole (CV1).

This is because, although the chapter recognizes the presence and importance of residential accommodation (in e.g. paras 12.1.3, 12.1.5), it presents the decisions and actions to be taken in the period as matters concerning either the Museums or the shopping centre clustered around South Kensington station. In fact if the Core Strategy is to be delivered in this area it will be as much about protecting and enhancing residential use, buildings and amenity. An example of the need to reinforce this third, residential element in the chapter is seen at para 12.3.8 where the Thurloe Street/Thurloe Place block is considered purely in terms of its ground floor uses. In fact much of the residential accommodation above is empty and an equally important action will be to secure the long-term residential future of this block.

### **Recommendation**

Chapter 12 requires redrafting in a variety of places to reflect the importance that the Core Strategy places upon the residential function of the Royal Borough. For example we recommend that the policy (CP11) is redrafted as follows (additions in italics):

‘The Council will ensure the continued success of South Kensington as a premier public cultural destination, as a local shopping centre *and residential area*, by securing good quality public open spaces and significantly improving accessibility for the very large number of visitors the area receives, supporting proposals to uplift the quality of the retail offer, especially proposals likely to favour local and niche markets, *and by consolidating the residential element while enhancing its amenities.*’

### **Chapter 14 Knightsbridge**

This chapter naturally contains the most important aims and policies for the area with which we are concerned. It rightly prioritises the interests of the International Shopping Centre while recognizing that the Centre is cheek-by-jowl with long established residential streets. In the long term the soundness of the Strategy will be judged by whether these two functions continue to operate successfully side-by-side.

We believe that there remain aspects of the chapter which are not justified because they do not properly plan for the balance between these activities. In addition there are parts which will not be effective in practice.

In the case of Knightsbridge, the Priorities for Action section (14.3) states that RBKC’s number one aim is to “create more retail floorspace, be this by the intensification of retail uses within the centre or by the expansion of the centre itself” (14.3.2). By contrast, the needs of residents figure much lower in the list of priorities (14.3.6) and the Keeping Life Local section is still confined solely to ‘shopping needs’. This section is unjustified because it places disproportionate emphasis on Knightsbridge's role as an international shopping centre. As a result the wording of policy CP13, in pledging support for ‘proposals likely to favour independent and high end retail and to maintain the area’s high quality of life.’, is weak. Equally the monitoring indicator no. 2 ‘Has Knightsbridge retained its identity as an important residential quarter and a service centre?’ is inadequate; quality of life must be monitored.

The Knightsbridge Association would therefore request that 'quality of life' for Knightsbridge residents be given equal emphasis to the fostering of commercial interests.

**Recommendation 1:** the following ‘quality of life’ goals should be woven into this section:

1. Planning and conservation
2. Traffic: through traffic minimisation in residential areas; parking controls
3. Law and order: crime control
4. Air quality and noise control
5. Proper limits on licensing and late night drinking
6. Residents' amenity and rights

## **The boundary of the International Shopping Centre.**

In order for land and buildings to be justifiably within the International Shopping Centre they should either contain at present or have the potential for containing in the future the kind of shops which characterise the Centre. The northern frontage of Brompton Road running west from Montpellier Street to the edge of the Centre does not fulfil these criteria for the following reasons:

- There is very little existing retail floorspace, certainly none of the size or prestigious nature required by international retailers.
- There is no scope for conversion or redevelopment of the buildings to achieve such units because of such factors as the shallowness of the frontage, the presence or proximity of residential property, the requirements of conservation policy etc.

It is therefore misleading to those seeking to locate within the Centre to include these properties within the boundary since planning permission for the kind of unit they require could not be given. This boundary coincides with the boundary of the CAZ, which properly expresses the mixed use nature of the frontage. In addition the removal of this section of frontage will reduce the need to provide safe and attractive facilities for crossing Brompton Road and minimise the huge conflict between pedestrians and traffic implicit in the designation of both sides of Brompton Road as part of the Centre.

**Recommendation 2.** Delete the frontage of Brompton Road between Montpellier Street and Brompton Square from the diagram on page 102 and the map of the Knightsbridge International Centre in 42.7. Make consequential changes.

### **14.3.11 Montpellier Street**

The area round Montpellier Street is densely residential. Over the past three years, residents with the help of the Knightsbridge Association have fought and won battles against disturbances from two restaurants and one pub on Montpellier Street. We have been supported in these cases by Westminster City Council, which covers the vast majority of Montpellier Street. We are concerned that the Strategy should not suggest any increase in such on-street activities in such an inappropriate location.

Justified.

RBKC's proposals to introduce commercial activities (specifically 'alfresco dining, street markets and events') into an historically residential street are not justified. This is because they are not 'founded on a robust and credible evidence base'. In particular, there is no 'evidence of participation of the local community and others having a stake in the area' as required by the 2004 Act. Quite the opposite, in fact: the Knightsbridge Association, which represents local residents, twice informed RBKC that the local community was opposed to such proposals being included in the LDF. The KA's request that the proposals be removed from the LDF was unjustifiably ignored by RBKC.

Effective.

RBKC's proposals for Montpellier Street are not effective. This is because they do not fulfil the following three criteria of the Statement of Representations Procedure:

i. The proposals are not based on 'sound infrastructure and delivery planning'. Montpellier Street is a densely populated residential area where commercial activities are limited to local shops operating during normal shopping hours. Introducing al fresco dining and drinking would disrupt the character of the street and endanger the central Licensing Objectives. Montpellier Street is used by local traffic accessing residential housing and by through traffic between Knightsbridge and Brompton Road. Introducing 'street markets and events' would close this thoroughfare and cause unacceptable disruption.

ii. The proposals do not 'have delivery partners who are signed up to it'. The local community opposes the proposals and ward councillors representing the major part of Montpellier Street (which is in Westminster) support the local community's objections.

iii. The proposals do not fulfil the criterion of 'coherence with the strategies of neighbouring Authorities'. Only

a very small portion of Montpelier Street (the portion of the west side of the street [only] which runs from Brompton Road to Cheval Place [only]) falls within RBKC. The remaining, much larger portion of the street falls within Westminster. RBKC officials have not consulted their Westminster colleagues before producing these proposals. They have not ascertained WCC's attitude to the proposed commercialisation of a residential street largely contained within WCC. They should now accept that the proposals are opposed by local WCC Ward Councillors and by local residents.

**Recommendation:** these concerns should be addressed by amending 14.3.12 and the text on the map opposite to say "The possibility of working with Westminster to implement public realm improvements in Montpelier Street including a shared surface scheme will be investigated". Consequential amendment is needed to the monitoring chapter at 14.4.7.

### **Bars, restaurants, night-clubs and other entertainment uses.**

The Strategy has a major deficiency in that it fails to provide policy guidance on bars, restaurants and night-clubs to those seeking to locate within the Royal Borough and those who must decide on planning applications for these uses. It will not be effective in delivering its aims without clear policy guidance on all important matters.

The main reference to these leisure uses is at para 31.3.24. This statement is inadequate to deal with the practical problems of locating a range of activities which powerfully affect the nature and character of a frontage or centre. On the one hand they can represent the key to a centre's economic success. On the other hand they can be noisy and smelly; they frequently engender demands for pavement tables and chairs and/or smoking areas as well as generating traffic and parking. The strategy is unjustified in not containing a full policy relating to these uses and will be ineffective in guiding planning decisions if it is not included.

The result of not considering this policy area can be seen in the material dealing with Knightsbridge. At 14.4.4, the Strategy calls for "public realm improvements to re-balance pedestrian footfall between the north and south sides of Brompton Road" (i.e. to send more shoppers onto the north side of the road). The close relation that Knightsbridge the shopping centre has with Knightsbridge the residential area means that there is no justification for helping the area to become a late night destination. Paragraph 14.4.4 continues to call for measures to "encourage people to stay longer". This should be changed to "spend longer shopping".

**Recommendation:** we believe that the Strategy should include a policy dealing specifically with bars, restaurants and other entertainment activities and that the location specific chapters should be reviewed in the light of the policy chosen.

**Please attach additional pages as required**