



# Responses to the Inspector

## Matter 1: Vision and Objectives

Core Strategy with a focus on North Kensington  
 Examination in Public  
 July 2010

# Public Examination of Royal Borough of Kensington and Chelsea's Core Strategy with a focus on North Kensington DPD

## Royal Borough of Kensington and Chelsea's Statement

### Matter 1 – Vision and Objectives

#### Question 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?*

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1.0 *Yes. The vision is directly related to the four components, and the strategic issues are derived from the issues as set out in Table 3.1 of Chapter 3 of the Core Strategy. The consultation undertaken sought views on alternative approaches of the strategic objectives and the vision.*

#### The four components and the Vision

- 1.1 The four components set out at the end of Chapter 2 are derived from the two key characteristics, and two broad spatial patterns:
- 1.2 The two key characteristic were identified to be:
- that the Borough is hugely successful – which brings with it its own challenges especially in relation to property values (paragraph 2.3.1); and
  - that the Borough is predominantly residential, despite being close to the centre of London (paragraph 2.3.2).
- 1.3 The two broad spatial patterns were identified to be:
- the obvious differentials on a whole range of characteristics of the northern third and the rest of the Borough (paragraph 2.3.3); and
  - a less marked cluster of the places of the Borough that have a national or international reputation, which tend to be in the south-east of the Borough (paragraph 2.3.4).
- 1.4 This leads to the identification of four components to drive the direction of the Core Strategy, that the Borough is:
- successful;
  - needs to address the disparity between north and south through regeneration;
  - has many places with national and international reputations which need to be enhanced; and
  - predominantly residential with a high quality of life that needs to be maintained (paragraph 2.3.19).

1.5 These components directly feed into the vision (CV1, page 36):

**Vision for the Royal Borough: Building on Success**

Our vision for Kensington and Chelsea over the next 20 years is to **build on success**. To further develop the strong and varied sense of place of the Borough, we will, in partnership with other organisations, and importantly with our residents:

- stimulate **regeneration** in North Kensington through the provision of better transport, better housing and better facilities;
- enhance the **reputation** of our national and international destinations – Knightsbridge, Portobello Road, South Kensington, the King’s Road, Kensington High Street, and Earl’s Court – by supporting and encouraging retail and cultural activities in particular;
- uphold our **residential quality of life** so that we remain the best place in which to live in London, through cherishing quality in the built environment, acting on environmental issues and facilitating local living, including through strengthening local neighbourhood centres.

[This is the summary part of the Vision, the full Vision goes on to give further detail]

1.6 It is noted, however, that in paragraph 2.3.19 reference is made to the ‘key *issues* and broad spatial patterns’, not ‘key *characteristics* and broad spatial patterns’. Making this correction is included in the schedule of post submission changes.

**The five strategic issues and the Strategic Objectives**

1.7 Chapter 2 of the Core Strategy identifies the strategic issues drawn from the spatial portrait:

- the threat that high residential values poses to social and community and non-residential uses;
- the need to further improve travel choices especially with north-south links and accessing existing rail infrastructure;
- protecting the existing high quality environment and ensuring new developments provide a legacy of similar quality;
- the localised concentrations of homes of single tenure and the need to diversify this; and
- the environmental impacts that activities in the Borough have.

1.8 In Chapter 3 a table is provided (Table 3.1) that shows how these issues ‘translate’ into the 7 strategic objectives of the plan. Paragraph numbers from Chapter 2 have been added to the first column of the table below, to demonstrate the link of the issue into the spatial portrait of the Borough.

The issue...	... Expanded and translated into...	... a Strategic Objective...	... addressing these topics
Protecting <b>local uses</b> and those that are important to the <b>vitality</b> of the Borough from potential loss to the higher values commanded by residential land uses. 2.1.3 2.2.5 2.2.16 + 17 2.2.20 2.2.30	Loss of social, community and local uses to residential, and the difficulty of land for new 'local' uses being made available.	To keep life local.	<i>social and community uses, local shopping facilities, 'walkable neighbourhoods'.</i>
	Loss of the range of uses that bring vitality to the Borough - shops, arts and cultural uses, offices and so forth, also as above from the pressure from residential land values.	To foster vitality.	<i>town centres, retail, arts and culture, creative industry and business.</i>
Improving <b>travel choices</b> to reduce car dependency, including getting better access onto the existing rail infrastructure. 2.2.21 – 2.2.29	The difficulty of moving north-south in the Borough, and the lack of access onto existing rail infrastructure in the north of the Borough, along with the continued need to reduce car dependency.	To offer better travel choices.	<i>public transport, walking and cycling, parking.</i>
Protecting the high quality historic environment and ensuring new developments are of equivalent quality so that we pass on a <b>legacy</b> to future generations, including quality within the <b>public realm</b> . 2.1.2 2.2.36 – 2.2.43	The need to ensure that the public realm - the space between our buildings, and our green spaces - matches in quality of so much of the architecture of the Borough.	To maintain and extend our engaging public realm.	<i>sense of place, attractive streets, parks and outdoor spaces.</i>
	The need to protect the built heritage passed down to us and to ensure new developments are equally valued by our successors.	To renew our legacy.	<i>quality design, conservation and enhancement.</i>
	... Expanded and translated into...	... a Strategic Objective...	... addressing these topics
	The demand for housing of all types and the current concentrations of housing tenures.	To achieve a diversity of housing.	affordable and market housing, estate renewal.
Issues relating to our use of natural resources and the impact upon the planet's systems.	To respect environmental limits.	climate change, waste, flooding, biodiversity, air quality and noise.	

### Are the vision and strategic objectives the most appropriate approach?

1.9 PPS12 sets out the tests of soundness to be met by Core Strategies and other Development Plan Documents. Paragraph 4.36 identifies that in order to meet the 'Justified' test of soundness, Core Strategies must not only be founded on a robust and credible evidence base, but also be "the most appropriate strategy when considered against the reasonable alternatives".

- 1.10 Paragraph 4.38 then sets out that an authority should “seek out and evaluate *reasonable* alternatives”, and goes on to point out that “there is no point in inventing alternatives if they are not realistic”.
- 1.11 The process of the preparation of the Core Strategy demonstrates that attention has been paid to the consideration of reasonable alternatives.
- 1.12 The *Issues and Options* consultation in November 2005 identified 52 issues across the Borough, and asked those engaged in the consultation to evaluate the issues, and suggest new ones. The Royal Borough has a corporate Vision of ‘Better City Life’, and the first issue raised therefore was ‘How can we achieve the Vision of ‘a Better City Life?’’. Other issues were then set out under the headings of Conservation and Development, Housing, Office and Industry, Transportation, Shopping and Town Centres, Social and Community Uses, Hotels, Leisure and Recreation, Renewable Energy and Sustainable Design, Waste and Site Allocations. This was accompanied by a printed booklet ‘response form’, which asked a whole range of questions in relation to each issue.
- 1.13 The *Interim Issues and Options* consultation of February 2008 crystallised these 52 issues into six Strategic Issues, which have, as the document has evolved, become the the Strategic Objectives, with one further addition later in the process. For each Strategic Issue, the document set out the opposing strategic directions that could be taken in relation to that issue. Keeping Life Local is given below as an example of the approach taken.

**Box 4: Keeping life local**

**Strategic issue**

At the core of the strategic objective of Keeping Life Local is this tension between the local and city-wide functions of the borough

**Strategic options**

Do you think that maintaining local facilities is of central importance to the quality of the residential neighbourhoods of the borough?

Or do you think that people that live in the borough should recognise that living at the centre of a capital city gives you so many benefits, you cannot also expect to have all your ‘local’ needs met locally?

Have we identified the right issues?

- 1.14 The Strategic Issues formed ‘chapters’ within which a range of other issues were also explored.
- 1.15 At the *Towards Preferred Options* stage, in June/July 2008, alternative visions for the Borough were proposed, both of which addressed the strategic objectives, but in quite different ways. The first vision took a ‘status quo’ approach: the Borough has many assets, and the strategy should be to keep it that way – “maintain the

Borough's excellence". The second vision took an 'improving' approach: just because the Borough is good now, does not mean to say that it could not be improved further – "improve an excellent Borough".

- 1.16 The alternative visions set out how the different strategic themes would become quite different strategic objectives under the different visions, and it also showed the impact of the different visions on the Places identified in the plan at that stage.
- 1.17 It was the second vision that was regarded as the most appropriate approach, and formed the basis of the Vision in the Submitted Core Strategy.
- 1.18 Through these consultations both the Strategic Objectives and the Vision for the Borough have been tested, along with a range of other 'smaller scale' issues. 'False' alternatives were not posited for the sake of it – only those regarded as reasonable were considered. Through this means it can be concluded that the Core Strategy takes the most appropriate approach.

## Public Examination of Royal Borough of Kensington and Chelsea's Core Strategy with a focus on North Kensington DPD

### Royal Borough of Kensington and Chelsea's Statement

#### Matter 1 – Vision and Objectives

##### Question 2

*The Vision aims to develop the strong and varied sense of place of the Borough in partnership with organisations and residents over a twenty year period, including regeneration in North Kensington. Does the Strategy show clearly how this Vision will be achieved?*

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- 2.0 *Yes: the Core Strategy sets out an overall Borough Spatial Strategy along with detailed Place visions, and a Delivery Strategy comprising Strategic Site Allocations, Development Management, Partnership Actions, and Infrastructure requirements, clearly showing how the Vision will be achieved.*
- 2.1 The relationships are most clearly shown in tabular fashion, showing the follow through of the Vision through the Core Policies and Places, Allocations, Development Management and Infrastructure.
- 2.2 A similar exercise was undertaken at the Towards Preferred Option stage, at Appendix A, which might be useful to show the progression of the plan as an integrated whole.
- 2.3 In preparing this table, a few minor changes are proposed to the Vision. These are shown as track changes in the first column of the table below, and are included in the schedule of post submission changes.

**Vision for the Royal Borough: Building on Success**

Our vision for Kensington and Chelsea over the next 20 years is to **build on success**. To further develop the strong and varied sense of place of the Borough, we will, in partnership with other organisations, and importantly with our residents:

Component of vision	Strategic Objective	Core Policy	Places	Strategic Allocations	DM	Corporate Actions	Infrastructure (in addition to policy C1)	Plan Bs
<ul style="list-style-type: none"> <li>stimulate <b>regeneration</b> in North Kensington through the provision of better transport, better housing and better facilities;</li> </ul>								
By 2028 <b>regeneration</b> in <b>North Kensington</b> will have resulted in <b>significantly improved transport</b> , including with a new Crossrail station at Kensal, better links to Hammersmith and Fulham across the West London line and improved north-south bus links overcoming the generally lower levels of accessibility in the north.	CO3	CP1 CP3	CV5 CV6 CV7 CV8 CV9	CA1	CT1 CT2	KLL5 BTC1 BTC2 REL4 REL5	pp242 row 1 pp243 row 4 pp246 row 3 pp246 row 5	1
2-3000 new <b>homes</b> will have been built, both private market and affordable, addressing the serious shortfall in housing need, and helping to <b>diversify supply</b> .	CO6	CP1 CP3	CV5 CV6	CA1 CA2 CA3	CH1 CH2 CH4	RL7 DH1 DH2		1 2 3
It will be of a <b>high quality design</b> , well integrated into its context, overcoming some of the barriers to movement by which the North of the Borough is characterised.	CO4 CO5	CP3	CV5 CV6 CV7 CV8 CV9	CA1 CA2 CA3 CA4	CR1 CR2 CL1 CL2 CL3 CL4 CL5 CL6	KLL10 BTC3 EPR1	n/a	n/a
Better <b>facilities</b> will have been provided including by the building of a new <b>academy</b> to serve the communities of North Kensington to address the serious shortage of secondary school places in the borough, helping to make life more <b>local</b> for residents.	CO1	CP1 CP3	CV9	CA4	CK1	KLL9	Pp246 row 2	4
The deficiency in local shopping will have been addressed with two <b>new town centres</b> at Kensal and Latimer.	CO1	CP1 CP3	CV5 CV9	CA1	CF1	KLL4 FV3	n/a	1 12

Component of vision	Strategic Objective	Core Policy	Places	Strategic Allocations	DM	Corporate Actions	Infrastructure (in addition to policy C1)	Plan Bs
The unique character of <b>Portobello Road</b> will have flourished, including the antiques and street market, adding to the <b>vitality</b> of the area.	CO2	CP3	CV7	n/a	CF2 CF3 CF4	KLL1 KLL11 FV2 FV10 FV11	n/a	12 13 14 15
Jobs will be readily available as the Employment Zones will have been <b>protected from encroaching residential</b> and be thriving centres for small businesses and the cultural industries sector.	CO2	CP1 CP3	CV5 CV9	n/a	CF5 CF6	FV5 FV6 FV7 FV8 FV9	n/a	16
The north of the Borough will be at the heart of <b>environmental</b> sustainability <del>including with</del> the combined heat and power network extending from the hubs at the major new developments at Kensal, Latimer and Wornington Green	CO7	CP1 CP3	CV5 CV6 CV9	CA1 CA2 CA4	CE1 CE2 CE3 CE4 CE5 CE6	REL4	pp242 row 1 pp246 row 4 pp245 row 1	1 2 4
<ul style="list-style-type: none"> <li>enhance the <b>reputation</b> of our national and international destinations – Knightsbridge, Portobello Road, South Kensington, the King’s Road, Kensington High Street, and Earl’s Court – by supporting and encouraging retail and cultural activities in particular;</li> </ul>								
In the Borough as a whole our <b>reputation</b> as a national and international destination will have been further enhanced. The Borough will have avoided becoming little more than a residential suburb, with a flourishing and <b>rich variety of retail and cultural</b> activities adding so much to the quality of life of the residents.	CO2	CP1 CP2	All Places	n/a	CF1 CF2 CF3 CF4 CF6 CF7	FV1	pp247 row 3	12 13 14 15 17 18
Our <b>top retail destinations</b> of <b>Knightsbridge, King’s Road, Kensington High Street</b> and <b>Portobello</b> will have been maintained and enhanced.	CO2	CP2	CV14 CV15 CV11 CV7	CA5	CF1 CF2 CF3 CF4 CR3	KLL1 KLL11 FV1 FV10 FV11	pp252 row 1 pp252 row 2 pp252 row 3 pp252 row 4 pp252 row5 pp253 row 5 pp253 row 6 pp254 row 3	12 13 14 15 25

Component of vision	Strategic Objective	Core Policy	Places	Strategic Allocations	DM	Corporate Actions	Infrastructure (in addition to policy C1)	Plan Bs
							pp254 row 4 pp254 row 5	
Opportunities to expand retail floorspace in Knightsbridge, King's Road, Fulham Road and South Kensington will have been taken up.	CO2	CP2	CV14 CV15 CV17 CV12	n/a	CF1	FV4	n/a	12
<b>Earl's Court</b> will remain an important cultural destination, as well as providing offices and around 2000 new dwellings on surrounding sites.	CO2 CO6	CP1 CP2	CV10	CA6 CA7	CF5 CF7 CH2	BTC4 REL4	pp248 row 3 pp249 row 2 pp249 row 3	16 18 36
Exhibition Road in <b>South Kensington</b> will be providing a first class experience to visitors to the national institutions, and have set a new standard nationally of streetscape design.	CO2 CO4	CP2	CV12	n/a	CF9 CR4	EPR13 RL10	pp253 row 3	20 26
The Royal Marsden and Brompton hospitals will continue to further its international reputation for delivering world class <b>health care</b> , education and research activities.	CO1	CP2	CV13	n/a	CK1	KLL6	n/a	9
<ul style="list-style-type: none"> <li>uphold our <b>residential quality of life</b> so that we remain the best place in which to live in London, through cherishing quality in the built environment, acting on environmental issues and facilitating local living, including through strengthening local neighbourhood centres.</li> </ul>								
Our <b>residential quality of life</b> will be improved for everyone and we will remain the best place to live in London with our <b>glorious built heritage</b> protected and improved, the removal of eyesores, and new buildings of <b>exceptional design quality</b> .	CO1 CO5	n/a	All Places	n/a	CK1 CK2 CK3 CR4 CR5 CR6 CL1 CL2 CL3 CL4 CL5 CL6	KLL2 KLL6 BTC5 BTC6 EPR3 EPR4 EPR6 EPR7 RL1 RL2 RL3 RL4 RL5 RL6 RL7	n/a	9 10 11 26 27 28 pp320

Component of vision	Strategic Objective	Core Policy	Places	Strategic Allocations	DM	Corporate Actions	Infrastructure (in addition to policy C1)	Plan Bs
						RL9		
New <b>homes</b> will have further diversified <b>housing tenure</b> , and provide high standards of <b>environmental performance</b> .	CO6 CO7	CP1	All Places	CA1 CA2 CA3 CA7	CH2 CE1 CE2	DH5 REL1 REL2	n/a	1 2 3 7 36 39 40
The waste we produce will be re-used, recycled or disposed of in or very near to the borough.	CO7	n/a	n/a	CA1 CA7	CE3	REL12 REL13	n/a	1 7 41
Sustainable Urban Drainage systems will be commonplace throughout the borough, <b>reducing the risk of flood events</b> , especially in the west of the Borough when combined with the upgrading of Counters Creek sewer and storm drain.	CO7	n/a	All Places	All allocations	CE2	REL6 REL7 REL8 REL9 REL10 REL11	pp261 row 4 pp261 row 5	40
Green links will help to improve <b>biodiversity</b> and <b>air quality</b> and <b>noise</b> will have been significantly improved.	CO7	n/a	All Places	CA1 CA7	CE4 CE5 CE6	EPR9 REL14 REL17 REL18 REL19 REL19	pp260 row 2	42 43 44

## Public Examination of Royal Borough of Kensington and Chelsea's Core Strategy with a focus on North Kensington DPD

### Royal Borough of Kensington and Chelsea's Statement

#### Matter 1 – Vision and Objectives

##### Question 3

*The Strategic Objectives have been developed to guide decisions and address the five issues (table in Chapter 3) set around an 'end state' of the vision. Do the Strategic Objectives provide a satisfactory means for guiding decisions to deliver the Vision?*

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- 3.0 *Yes. The Vision for the Borough is to "Build on Success". The Strategic Objectives establish a clear qualitative framework to guide the delivery of the Vision.*
- 3.1 The Vision is clear: to build on success. This is expanded in terms of three clear ambitions:
- to regenerate North Kensington;
  - to enhance the reputation of our national and international destinations; and
  - to uphold our residential quality of life.
- 3.2 These are further expanded in the full Vision which sets out how the Vision will be fulfilled. However, "Building on Success" is not 'just' a question of specific actions. The question "what sort of place do we want this to be?" also need to be addressed.
- 3.3 The very 'title' of the Vision (Building on Success) identifies that the Borough is already of high quality. It is therefore necessary for this Vision to be accompanied by a clear qualitative framework – it is this aspect which is fulfilled by the Strategic Objectives.
- 3.4 A more conventional approach might have been to expand the ambitions of the Vision (regeneration, reputation, residential quality of life) into Objectives. This approach was rejected for two reasons.
- 3.5 Firstly, it potentially 'separated off' North Kensington from the rest of the Borough. At the Interim Issues and Options stage of the preparation of the Core Strategy, there was a separate document – the North Kensington Area Action Plan – issued in parallel with the emerging Core Strategy. It was clear that it was interpreted that somehow the Core Strategy did not apply to the north of the Borough, and it was for that reason the specific needs of North Kensington were integrated into the Core Strategy. It was important in setting the Strategic Objectives for the integrated Core Strategy that we did not re-create this false division between the north and the rest of the Borough. There was a very strong desire to ensure that the Core Strategy was a plan for the whole Borough – with a focus on North Kensington – and not, as might otherwise have been the case, a plan of two halves.

- 3.6 Secondly, such an approach would have missed out on the qualitative aspirations of the Borough. Thus, while a range of changes would have taken place within the Borough, they might have failed to deliver the very high quality expected within the Royal Borough, and thus not deliver the Vision to “Build on Success”
- 3.7 Finally, had objectives set out under the ‘3 Rs’ of the Vision attempted to deal with the important qualitative aspects, the objectives would need to have been overlapping and possibly repetitive. This is explained at para 3.3.3 of the Core Strategy: “... *the attractiveness of the Borough as a place to live, and the very high housing need, is an issue in regeneration and quality of life. The resulting residential land values being able to out compete other land uses has a knock on effect on local, social and community, uses - fundamental to residential quality of life, and those that bring vitality to our destinations of national and international importance. Overcoming existing transport issues is important in regenerating North Kensington, but is also an important component in residential quality of life. The quality of the built environment and public realm we pass on is fundamental to regeneration, but also to our national and international reputation, and to our residents' quality of life.*”
- 3.8 Thus it is the Council’s view that the Strategic Objectives provide a satisfactory means for guiding decisions to deliver the Vision ‘Building on Success’, providing the essential qualitative framework for the Borough as a whole, to be read alongside the three ‘end state’ ambitions and more detailed actions in the Vision.

## Public Examination of Royal Borough of Kensington and Chelsea’s Core Strategy with a focus on North Kensington DPD

### Royal Borough of Kensington and Chelsea’s Statement

#### Matter 1 – Vision and Objectives

##### Question 4

*Objectives, and the policies that derive from them, should be specific to the Borough and, whilst they should be consistent with national policy, they should not simply duplicate it. Are the objectives, and therefore the Strategy itself, sufficiently local to the Borough?*

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4.0 *Yes, the Strategic Objectives have been derived from the strategic issues identified in the spatial portrait of the Borough.*

4.1 The Strategic Objectives are directly derived from the consideration of the strategic issues faced by the Borough. This is set out in Table 3.1, in Chapter 3 of the Core Strategy. Table 3.1 is reproduced in Matter 1, Item 1, with the addition of cross references to the relevant paragraphs in Chapter 2 where the issues were identified.

4.2 On pages 39 - 41 of the Core Strategy the Strategic Objectives are set out in full. Each Strategic Objective is set out in a coloured box, with the prefix CO (Core Objective). Before each of the Strategic Objectives there is a paragraph (paragraphs 3.3.9 – 3.3.15) specifically setting out what are the locally distinct characteristics of the Borough that necessitate that particular Strategic Objective.

4.3 The statement of the locally distinct characteristics that lead to the specific objectives has been clear through the earlier drafts of the Core Strategy. The example below is taken from Towards Preferred Options, paragraph 2.3.5.

- **Keeping Life Local**

***What is our ambition?*** To allow community life to flourish through the ready availability of facilities such as local shops and social and community facilities which are accessible to all and that lie at the heart of every community.

***Why is this significant for the Royal Borough?*** The borough is a high density residential area where there is fierce competition for land. The central London location fuels competition with the ‘local’ borough function. Keeping local facilities and services is critical to the quality of life for residents. The planning system is central to the protection of these uses that have low land values, but high values to the community.

4.4 Interestingly, the use of the headings perhaps helps to clarify the point regarding local distinctiveness. The Council would be open to the idea of including bold text ‘Our Local Case:’ at the beginning of paragraphs 3.3.9 – 3.3.15 of the Submission Core Strategy if the Inspector was of the view that this would aid clarity. This is included in the schedule of post submission changes.

## Public Examination of Royal Borough of Kensington and Chelsea’s Core Strategy with a focus on North Kensington DPD

### Royal Borough of Kensington and Chelsea’s Statement

#### Matter 1 – Vision and Objectives

##### Question 5

*The Strategy is intended to deliver development on Strategic Allocations and ‘place shaping’ for the places where significant changes are planned during the Plan period. **Are the timescales for achieving the development and planned changes realistic?***

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5.0 *Yes, the timescales for achieving the development and planned changes in those places where significant change is envisaged are realistic. The main timescales are set out in relation to the strategic sites within the places rather than in the places themselves.*

#### Types of Places

5.1 Not all the Places in the Core Strategy are areas where significant change is planned. The Core Strategy classifies the Places in two ways.

- First, the Places are set out in the Core strategy in three groups, related to the Vision for the Borough: those places that will contribute to regeneration in north Kensington; those that have a national or international reputation; and ‘other areas’.
- Second, at paragraph 1.3.5, and again at 4.4.1, it is identified that the places represent the place in the Borough that “will be undergoing considerable change, and all of our district, major and international town centres. The exception to these categories is the Westway...”

5.2 In Matter 3 Question 1 it is proposed that a table clarifying these roles is included in section 4.4 of the plan, to aid the reader’s comprehension.

#### Relationship between Places and Strategic Sites

5.4 Not all the places that are identified as an area of change contain a strategic site allocation. It is worth noting that the relationship between the Places and the Strategic Sites in the Core Strategy could be made clearer, and it is suggested that the tabulated list of sites at paragraph 19.1.2 is replaced with the table below. This is included in the schedule of post submission changes.

<u>Chapter</u>	<u>Strategic Site</u>	<u>Place</u>
<u>20</u>	<u>Kensal Gasworks</u> (also referred to as <u>Kensal Canalside</u> in the <u>London Plan Annex 1 – list of opportunity areas</u> )	<u>Kensal (Chapter 5)</u>
<u>21</u>	<u>Wornington Green</u>	<u>Golborne/Trellick (Chapter 6)</u>

<u>Chapter</u>	<u>Strategic Site</u>	<u>Place</u>
<u>22</u>	<u>Land adjacent to Trellick Tower (sometimes referred to as 'Edenham')</u>	<u>Golborne/Trellick (Chapter 6)</u>
<u>23</u>	<u>Kensington Sports Centre</u>	<u>Latimer (Chapter 9)</u>
<u>24</u>	<u>Commonwealth Institute</u>	<u>Kensington High Street (Chapter 11)</u>
<u>25</u>	<u>Warwick Road</u> (five sites including 100 West Cromwell Road)	<u>Earl's Court (Chapter 10)</u>
<u>26</u>	<u>Earl's Court Exhibition Centre</u>	<u>Earl's Court (Chapter 10)</u>

### **Realism of the timescales to achieve the planned changes**

5.4 Each of the places where significant change is envisaged is set out in turn.

#### *Kensal, with the Kensal Gasworks Strategic Site Allocation.*

5.5 The timetable for the delivery of the Gasworks site is set out at paragraph 20.3.4 – 6. Discussions are ongoing between the Council and the two principal land owners for phase 1, Ballymore and Sainsbury's, as well as with Crossrail. The two land owners have also been in discussions with one another. The Council has undertaken some preliminary work regarding the preparation of an SPD, but is waiting for resources to be released from preparing the Core Strategy before progressing this further.

5.6 The timetable set out in the Core Strategy envisaged an SPD to be adopted by in 2011. This is still the ambition of the project. The start on site date for phase one might have been over ambitious, as it also indicates 2011. If a Crossrail station is to be constructed, works will be required to begin during 2012. It is therefore suggested for clarity that the third bullet point in paragraph 20.3.5 is amended to read "2011/2012: Commence work on site"

#### *Golborne/Trellick, with the Wornington Green and Land Adjacent to Trellick Tower Strategic Site Allocations*

5.7 Regarding Wornington Green, the SPD was adopted in 2009 as set out at paragraph 21.3.4, and the planning application was granted consent, and the HCA funding secured, again on the times set out in the Core Strategy. Discharge of condition applications are expected shortly to allow for the start on site during 2010, or early in 2011. Completion of phase 1 is thus as envisaged in the Core Strategy of 2015

5.8 For the Land Adjacent to Trellick Tower, see paragraph 22.3.4, the plan identifies the site to be available for development within the first 5 years of the plan. The site is within the Council's ownership. Preliminary capacity work has already having been undertaken. The LDS (in which the site is called 'Edenham') identifies the SPD to be adopted by the end of 2011.

*Latimer, with the North Kensington Sports Centre Strategic Site Allocation*

- 5.9 Paragraph 23.3.4 sets out the timetable for the delivery of the Sports Centre site. It indicates that a planning application was expected in 2010/2011. The Supplementary Planning Document to guide the application is in preparation, with a report exploring options for the master-planning of the site is to be taken to Cabinet in July 2010. The SPD on track for adoption in early 2011, allowing for submission of an application for the new academy later that year.
- 5.10 The Latimer 'place' (Chapter 9) identifies that there are longer term wider ambitions for the area, and at 9.4.4 identifies that further work will be undertaken in the form of an Area Action Plan. This is identified in the Council's LDS. Initial scoping is leading to a review of whether the correct vehicle is a DPD or an SPD, and thus for clarity a change is sought to para 9.4.4, removing reference to an Area Action Plan which can only be a DPD:

The Council will prepare a masterplan to form part of the LDF and Area Action Plan to explore the potential for the area

*Earl's Court, including the Earl's Court Exhibition Centre Strategic Site Allocation*

- 5.11 An arrangement for joint working between the adjoining London Borough of Hammersmith and Fulham, the GLA and the Royal Borough has been put in place for the preparation of an SPD including a masterplan, to guide the development of the site. It is envisaged that this will be adopted by the summer of 2011, when a planning application is expected. This is in line with the timetable set out in paragraph 26.3.4
- 5.12 As can be seen, the timetables for these major projects remain realistic and are on track for delivery.

## Public Examination of Royal Borough of Kensington and Chelsea's Core Strategy with a focus on North Kensington DPD

### Royal Borough of Kensington and Chelsea's Statement

#### Matter 1 – Vision and Objectives

##### Question 6

*The objectives of policies should not be in conflict in order to achieve consistency in decision making. Is there internal consistency between Strategic Objectives and the policies that derive from them?*

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- 6.0 *Yes – there is internal consistency between the Strategic Objectives and the policies that derive from them.*
- 6.1 In Towards Preferred Options (June/July 2008) it was observed at paragraph 2.4.1 that “in terms of spatial planning, it is important not only to understand objectives in their own right, but also to understand how they inter-relate.”
- 6.2 Of the seven strategic objectives, it can be seen that there are two main ‘types’ – those principally concerned with land use (Keeping Life Local, Fostering Vitality and Diversity of Housing), and those concerned with the quality of the resultant environment (Engaging Public Realm, Renewing the Legacy and Respecting Environmental Limits). Better Travel Choices to an extent straddles the two.
- 6.3 Conflicts, if they were to occur, would be most likely within these groups.
- 6.4 Taking the ‘land use’ Strategic Objectives first. Keeping Life Local and Fostering Vitality are addressing two different aspects of non-residential land uses, in order to ensure the Borough remains ‘mixed use’, and does not become ‘just’ a dormitory suburb.
- 6.5 Diversity of Housing might be perceived to be in conflict with Keeping Life Local and Fostering Vitality. However, although there is significant demand for housing in the Borough, the strategic perspective has been taken by the Council that we should not seek ‘housing at any cost’. Significant large housing developments have been identified in the plan, which allows the current London Plan housing targets to be raised, without the need for the loss of the non-residential mixed uses that are accommodated often in a finely grained way throughout the Borough. Instead, the strategic direction in relation to housing is to diversify the housing stock.
- 6.6 It can therefore be seen that there is no conflict between the ‘land use’ Strategic Objectives of the Core Strategy.

- 6.7 Looking then to the Strategic Objectives that deal with environmental quality. Again, it might be imagined that the Strategic Objective to preserve our heritage assets – Renewing the Legacy – might be in conflict with that which is looking to reduce energy and carbon emissions – Respecting Environmental Limits.
- 6.8 However, we have evidence that shows that we can achieve the standards set out in the policies that deliver Respecting Environmental Limits Strategic Objective with the historic environments of the Borough. This issue is further explored in the response to Matter 9b Question 1.