



# Responses to the Inspector

## Matter 3: Policies for Places

**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 3 – Policies for Places: General

#### Question 1

*Chapter 4 advises that place shaping requires that different plans and programmes from across the Council and its partners are integrated. Do the policies for places give a clear framework on which to base future actions?*

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- 1.0 *No, but it was not the intention that the policy would fulfil that function. Instead it is the Visions and Place Chapters as a whole that do that.*
- 1.1 Section 4.4, Places, provides the introduction to the Place Profiles as a whole. It might be more logical to the reader if this section came at the end of Chapter 4, immediately before the place profiles, and it is therefore suggested that Section 4.4 Places, and Section 4.5 North Kensington 'swap places'. This is set out in the schedule of post submission changes.
- 1.2 Paragraphs 4.4.3 and 4.4.4 set out how each place follows a standard pattern, with an introduction, Vision, priorities for action and a delivery section. However, what these paragraphs do not make clear is how each of these sections is intended to be used. Thus the reader might well be under the impression that the Policy plays a more central role in providing a framework on which to base future actions than is in fact the case.
- 1.3 For this reason, it is suggested that the following changes are made to Section 4.4. Please note that for ease of reading, the changes proposed in relation to Matter 3, Question 4 – the relationship of places and strategic sites – are included in the changes below, and cross references in the response to that question.
- 1.4 **4.4 Places**
- 1.5 **4.4.1** The *Place Profiles* provide the **integrating** function of the spatial strategy. They take the 'what', 'when', 'where' and 'how', and bring these together to show, through a vision, how that Place will develop over the lifetime of the plan. There are 14 Places identified (see Plan). The Borough comprises many more places than these. The places mainly relate to the two spatial themes of the Vision for the Borough (CV1): the regeneration of North Kensington, and enhancing the reputation of those places in the Borough with a national or international reputation – by and large our town centres.

1.6 There are some exceptions to these two groups. We have also included other places where either significant change is planned, or ~~and the district, major and international~~ which are town centres ~~which are the focus for activity~~ not otherwise picked up in the spatial categories of the Vision. ~~The one exception to these criteria is We have also included the Westway.~~ ~~This has been included~~ because of its particular negative impacts, which need to be addressed as part of the programme of regeneration in North Kensington.

| <u>Chapter</u> | <u>Place</u>                      | <u>Spatial themes within the Borough Vision</u>        | <u>Area of change or Town Centre?</u>           |
|----------------|-----------------------------------|--|---|
| <u>5</u>       | <u>Kensal</u>                     | <u>North Kensington Regeneration</u>                   | <u>Area of Change</u>                           |
| <u>6</u>       | <u>Golborne/Trellick</u>          | <u>North Kensington Regeneration</u>                   | <u>Area of Change</u>                           |
| <u>7</u>       | <u>Portobello</u>                 | <u>North Kensington Regeneration</u>                   | <u>Town Centre</u>                              |
| <u>8</u>       | <u>Westway</u>                    | <u>North Kensington Regeneration</u>                   | <u>Neither – the exception to the rule</u>      |
| <u>9</u>       | <u>Latimer</u>                    | <u>North Kensington Regeneration</u>                   | <u>Area of Change</u>                           |
| <u>10</u>      | <u>Kensington High Street</u>     | <u>Place with National or International Reputation</u> | <u>Town Centre</u>                              |
| <u>11</u>      | <u>Earl’s Court</u>               | <u>Place with National or International Reputation</u> | <u>Both an Area of Change and a Town Centre</u> |
| <u>12</u>      | <u>Knightsbridge</u>              | <u>Place with National or International Reputation</u> | <u>Town Centre</u>                              |
| <u>13</u>      | <u>Brompton Cross</u>             | <u>Place with National or International Reputation</u> | <u>Town Centre</u>                              |
| <u>14</u>      | <u>South Kensington</u>           | <u>Place with National or International Reputation</u> | <u>Town Centre</u>                              |
| <u>15</u>      | <u>Kings Road / Sloane Square</u> | <u>Place with National or International Reputation</u> | <u>Town Centre</u>                              |
| <u>16</u>      | <u>Notting Hill Gate</u>          | <u>Other</u>   | <u>Town Centre</u>                              |
| <u>17</u>      | <u>Fulham Road</u>                | <u>Other</u>   | <u>Town Centre</u>                              |
| <u>18</u>      | <u>Lots Road / World’s End</u>    | <u>Other</u>   | <u>Area of Change</u>                           |

- 1.7 Within most of the places listed above as Areas of Change we have identified significant sites for redevelopment. These are called the Strategic Sites, and they are allocated in this plan (Section 2A, Chapters 20-26) for specific uses. The table below shows which Places also have a Strategic Site Allocation.

| <u>Chapter</u> | <u>Place</u>                      | <u>Strategic Site</u>   |
|----------------|-----------------------------------|---|
| <u>5</u>       | <u>Kensal</u>                     | <u>Kensal Gasworks (Chapter 20) (also referred to as Kensal Canalside in the London Plan Annex 1 – list of opportunity areas)</u> |
| <u>6</u>       | <u>Golborne/Trellick</u>          | <u>Wornington Green (Chapter 21) Land adjacent to Trellick Tower (Chapter 22)</u>   |
| <u>7</u>       | <u>Portobello</u>                 | <u>No strategic sites</u>   |
| <u>8</u>       | <u>Westway</u>                    | <u>No strategic sites</u>   |
| <u>9</u>       | <u>Latimer</u>                    | <u>Kensington Leisure Centre (Chapter 23)</u>   |
| <u>10</u>      | <u>Kensington High Street</u>     | <u>Commonwealth Institute (Chapter 24)</u>  |
| <u>11</u>      | <u>Earl’s Court</u>               | <u>Warwick Road (Chapter 25) Earl’s Court Exhibition Centre (Chapter 26)</u>  |
| <u>12</u>      | <u>Knightsbridge</u>              | <u>No strategic sites</u>   |
| <u>13</u>      | <u>Brompton Cross</u>             | <u>No strategic sites</u>   |
| <u>14</u>      | <u>South Kensington</u>           | <u>No strategic sites</u>   |
| <u>15</u>      | <u>Kings Road / Sloane Square</u> | <u>No strategic sites</u>   |
| <u>16</u>      | <u>Notting Hill Gate</u>          | <u>No strategic sites</u>   |
| <u>17</u>      | <u>Fulham Road</u>                | <u>No strategic sites</u>   |
| <u>18</u>      | <u>Lots Road / World’s End</u>    | <u>No strategic sites</u>   |

1.8 **4.4.2** Place shaping is at the centre of spatial planning. Place shaping requires that different plans and programmes from across the Council and its partners are integrated. It is not enough, therefore, to allocate specific development sites, nor to set out ‘generic’ policies to guide development across the Borough. Each Place as a whole needs to be considered, in terms of development management and in terms of the actions of other bodies, both public and private, that have a bearing on the future quality of the Place. It also requires a clear vision is therefore required of how different places are to evolve in the future, to give a clear framework for future actions, both of for the Local Planning Authority, other parts of the Council, and our partners, and private land owners. This is the function of the *Place Profiles*.

1.9 **4.4.3** Each Place pProfile starts with an introduction that sets out the basic issues, and a Vision to guide the future evolution of that place. Future actions by the Council and its partners are then set out under Priorities for Action. These are grouped under the sStrategic eObjectives of the plan as a whole. Footnotes are used to show where

the policies are in the plan that will implement these actions. Together, these three parts of the Place Profile provide the framework for future actions.

- 1.10 **4.4.4** The last section of each Place Profile is Development, Infrastructure and Monitoring. Delivery. A policy to guide development management decisions is provided. However, as is stated above, it is the Vision and Priorities for Action that are seen as providing the framework to guide future decisions relating to the place. The Place Policy is included in order to ensure that the place shaping role of the development management function can be given due weight in relation to the application of the policies in the plan, particularly with regard to the generic development management policies in Section 2B, Chapters 30 – 36, and a
- 1.11 An indication of the likely extent quantum of development is given in each Place. The quantum of development envisaged in each Place is included at the end of each Place Profile. In many Places, potential development opportunities in addition to the strategic sites are identified, but these are small, and thus to allocate them would be inappropriate in a Core Strategy. **4.4.5** They must not be confused with allocations. Strategic Site ~~a~~Allocations are included in this plan in Section 2(B). ~~Each of the strategic allocations is located within one of the places – but not every place has such an allocation.~~
- 1.12 The specific infrastructure known at this stage is identified, future planning documents that are seen as necessary to the delivery of the Vision are also set out, and criteria on which the delivery of the Vision will be monitored are included at the very end of each Place Profile.
- 1.13 **Policy CP 2 Places**  
The Council will protect, promote and enhance the local distinctiveness of the Places of the Borough, and improve their character and quality and the way they function.

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

**Matter 3 – Policies for Places: General**

**Question 2**

*Each chapter in the ‘Places’ section considers the area against the strategic objectives but offers a single policy which is not separately monitored (North Kensington, CP3, being the exception). Rather each Place has a monitoring section, and policies involved in delivering the Vision are highlighted in footnotes. **Is the Plan sufficiently clear on how the policy for each Place will realise the Vision?***

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2.0 *Yes – the inspector is requested to look at the responses to Matter 3 Questions 1 and 3, which are considered to cover this question.*

# 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 3 – Policies for Places: : General

#### Question 3

*Infrastructure that would help to deliver the Vision is identified for each Place within the Place Chapter and output indicators are provided in the monitoring section. Is the relationship between infrastructure needs, output indicators and monitoring actions necessary, clearly explained?*

Penelope Tollitt  
June 2010

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- 3.0 *No – we would like to take the opportunity to clarify this as set out below.*
- 3.1 In the monitoring chapter (Chapter 38), paragraph 38.4.1 states “for places we have taken the view that we should monitor the implementation of each Place Vision rather than the relevant Place Shaping Policy (policies CP45 – 17 18)”
- 3.2 However, unhelpfully, this is not explained in the monitoring section of each Place. Neither does that section explain how infrastructure is to be monitored.
- 3.3 We therefore suggest that the monitoring section of each place needs to be modified. With the exception of the list of items for monitoring, all text should be deleted and replaced with the text shown below. This is included in the schedule of post-submission changes.
- 3.4 We have also noted that there are inconsistencies between the infrastructure lists in the monitoring section of the ‘Places’, and those of the infrastructure table in Chapter 37. Changes to align the two sources are set out at the end of this paper, and included in the schedule of post-submission changes, if the Inspector is minded to allow these changes to be made.
- 3.5 Changes proposed to the section entitled ‘monitoring’ within each ‘Place’.**
- 3.6 These changes are standard for all places, but are included in full for each ‘Place’ in the schedule of changes.
- 3.7 Monitoring
- 3.8 *The vision: The focus of monitoring for [insert name of place] must be the extent to which the Vision has, or has not, been achieved. The following output indicators will be used to monitor the Vision.*

- 3.9 [list of existing indicators for each place to be inserted]
- 3.10 The Priorities for Action: a separate monitoring framework has not been established for these. Instead, cross references are made through footnotes to policies and actions elsewhere within the plan that are monitored in the framework set out in Chapter 38.
- 3.11 Development Management: this policy is not separately monitored. The policy is a mechanism to ensure that those aspects of the Vision that can be controlled through development are accorded due weight – it is thus the Vision rather than the policy that should be the focus of monitoring.
- 3.12 Quantum of Development: this will be monitored through Policy CP1 – additional criteria are not required.
- 3.13 Infrastructure: this will be monitored through the Infrastructure Delivery Plan, from which the place specific infrastructure has been drawn for inclusion in this Place chapter. Additional monitoring criteria are not therefore required.
- 3.14 Future plans and documents: progress on the preparation of these documents will be recorded in the Council’s Annual Monitoring Report, published in the autumn of each year.
- 3.15 Aligning the infrastructure references**
- 3.16 As referred to above, there are inconsistencies between the infrastructure listed in the ‘Places’ and that in the infrastructure table. The table below sets out changes required to make these two sources consistent. These changes are included in the schedule of post submission changes.

| Place                            | Not in the infrastructure table in Chapter 37 (but listed in the ‘Place’ infrastructure section)  | Not in the ‘Place’ infrastructure section (but listed in the infrastructure table in Chapter 37)   |
|----------------------------------|---|--|
| <b>Kensal</b>                    | <ul style="list-style-type: none"> <li>• Street trees</li> <li>• Public art</li> <li>• Enhanced pedestrian links towards Notting Hill Gate via Portobello Road</li> </ul> | <ul style="list-style-type: none"> <li>• CCHP and on-site waste management facility</li> <li>• Replacement of gas holders</li> <li>• Additional GP premises</li> <li>• Education Places</li> </ul> |
| <b>Golborne/ Trellick</b>        | <ul style="list-style-type: none"> <li>• No differences</li> </ul>  | <ul style="list-style-type: none"> <li>• No differences</li> </ul>   |
| <b>Portobello / Notting Hill</b> | <ul style="list-style-type: none"> <li>• Improvements to help close the gap between Portobello Road Centre and Golborne (in</li> </ul>                                    | <ul style="list-style-type: none"> <li>• Enhanced pedestrian links to Notting Hill Gate and Westbourne Grove. (In the</li> </ul>   |

| Place                              | Not in the infrastructure table in Chapter 37 (but listed in the 'Place' infrastructure section)   | Not in the 'Place' infrastructure section (but listed in the infrastructure table in Chapter 37)                          |
|------------------------------------|--|---|
|                                    | the table they are only 'improvements to the area')  | infrastructure table the enhanced pedestrian links mentioned are only to Ladbroke Grove.)                                 |
| <b>Westway</b>                     | <ul style="list-style-type: none"> <li>• No differences</li> </ul>   | <ul style="list-style-type: none"> <li>• No differences</li> </ul>  |
| <b>Latimer</b>                     | <ul style="list-style-type: none"> <li>• No differences</li> </ul>   | <ul style="list-style-type: none"> <li>• Provision of a CCHP network</li> <li>• Co-location of health premises</li> </ul> |
| <b>Earl's Court</b>                | <ul style="list-style-type: none"> <li>• Additional new public open space, including considering opportunities to create biodiversity</li> </ul>   | <ul style="list-style-type: none"> <li>• CCHP network or similar</li> </ul>   |
| <b>Kensington High Street</b>      | <ul style="list-style-type: none"> <li>• Improvements to the southern end of Kensington Church Street</li> </ul>   | <ul style="list-style-type: none"> <li>• No differences</li> </ul>  |
| <b>South Kensington</b>            | <ul style="list-style-type: none"> <li>• Expansion of medical services (the table only mentions the expansion of <u>services</u>: medical needs to be specified)</li> <li>• Improvements to the pedestrian tunnel</li> </ul> | <ul style="list-style-type: none"> <li>• No differences</li> </ul>  |
| <b>Brompton Cross</b>              | <ul style="list-style-type: none"> <li>• Public realm improvements including a central sculptural feature</li> </ul>   | <ul style="list-style-type: none"> <li>• No differences</li> </ul>  |
| <b>Knightsbridge</b>               | <ul style="list-style-type: none"> <li>• No differences</li> </ul>   | <ul style="list-style-type: none"> <li>• No differences</li> </ul>  |
| <b>King's Road / Sloane Square</b> | <ul style="list-style-type: none"> <li>• No differences</li> </ul>   | <ul style="list-style-type: none"> <li>• New GP surgery</li> </ul>  |
| <b>Notting Hill Gate</b>           | <ul style="list-style-type: none"> <li>• Green infrastructure in the form of street trees and living roofs / walls</li> </ul>  | <ul style="list-style-type: none"> <li>• No differences</li> </ul>  |
| <b>Fulham Road</b>                 | <ul style="list-style-type: none"> <li>• No differences</li> </ul>   | <ul style="list-style-type: none"> <li>• No differences</li> </ul>  |
| <b>Lots Road / World's End</b>     | <ul style="list-style-type: none"> <li>• No differences</li> </ul>   | <ul style="list-style-type: none"> <li>• Chelsea-Hackney Line Improvements</li> </ul>                                     |

## 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 3 – Policies for Places: General

##### Question 4:

*Some Places also have a Strategic Site Allocation. Is the relationship between the Vision for the Place and the Strategic Site Allocation always clearly articulated?*

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4.0 *No – we would like to clarify this by inserting new standard text referencing the Vision in the introductory section of each Strategic Site Allocation. In addition, we would like to make specific reference in each Place to the Strategic Sites, for clarity. It would also be beneficial if there was greater clarity about the relationship between the Places and the Strategic Site Allocations – Matter 1 Question 5 recommended that the table in Chapter 19, introducing the Strategic Sites, is amended to specifically set out which Places the sites fall within. It is suggested here that similar clarification is included in Section 4.4, which introduces Places as a whole. The proposed changes to 4.4 are included in the Council's response to Matter 3 Question 1.*

#### Changes to the Strategic Sites Chapters

- 4.1 In the final paragraph to the Introduction section of each Strategic Site, reference is made to the related Place chapter, and to the priority order of the Strategic Objectives for that place. Thus at Kensal:
- 4.2 "20.1.4 Kensal Gasworks is located in the *Kensal Place*, Chapter 5, where the Strategic Objectives of the plan as a whole have been listed in the following order of priority: Respecting Environmental Limits..."
- 4.3 However, no reference is made to the Vision of the Place. This is a considerable oversight, given the importance of the Vision in place shaping, and the central role any strategic allocation will have in delivering the Vision.
- 4.4 It is therefore suggested that within each Strategic Site, the last paragraph of the introduction is modified. The example below is Kensal – the italicised words are those that would need to be changed for each of the Strategic Sites.
- 4.5 20.1.4 *Kensal Gasworks* is located in the *Kensal Place*, Chapter 5. Particular attention is drawn to the Vision for *Kensal* (see section 5.2), and the Priorities for Action (section 5.3), which consider the wider *Kensal* area beyond this specific strategic site allocation. In the Priorities for Action section, the actions are set out under the headings of the , where the Strategic Objectives of the plan as a whole, but have been listed in the following order of priority regarded as appropriate for *Kensal*: Respecting Environmental Limits...

- 4.6 Similar changes would be made to each of the Strategic Site Allocations. Because they are standard text changes they are not set out here, but are included in the post-submission schedule of changes.

### **Changes to the Places Chapters**

- 4.7 In order to make the link with the strategic sites more specific, it is proposed that the wording of key paragraphs in the places is modified to make it clearer that this is making reference to strategic sites, or that new paragraphs are inserted for the same purpose. The proposed changes are set out for each place below.

#### *Kensal*

- 4.8 5.1.6 The western part of the Kensal 'Place', has significant development potential ... not dissimilar in size to that of Paddington Basin development in the neighbouring City of Westminster. This site is allocated in this Core Strategy as a Strategic Site – see Chapter 20.

#### *Golborne/Trellick*

- 4.9 6.1.5 There are two strategic site allocations in Golborne/Trellick. One is at At Wornington Green (Chapter 21), where the Kensington Housing Trust are have been exploring ways to renew the estate, and planning permission, in outline for the whole estate, and in detail for phase one, nearest the Golborne road, was granted in March 2010. The need for renewal is driven by a number of factors...
- 4.10 *[note: the opportunity has also be taken here to update the text on Wornington Green in the light of the recent planning permission]*
- 4.11 6.1.6 The other strategic site allocation is the Edenham Site – located next to the land adjacent to Trellick Tower (Chapter 22) – and provides opportunities...

#### *Latimer*

- 4.12 Insert two new paragraphs after 9.1.5:
- 4.13 9.1.6 There is a specific opportunity in relation to the existing site of the Leisure Centre. This Core Strategy allocates the Leisure Centre site as the site of the much needed new school in the north of the Borough (see Chapter 23). Preliminary work undertaken in the summer of 2009 indicated that the school could be accommodated without compromising the existing leisure centre.
- 4.14 9.1.7 Other specific opportunities to realise the Vision (see below) have not been identified in this Core Strategy. They will be identified through a subsequent planning document focusing only on the Latimer area.
- 4.15 Other paragraph numbering will need to be adjusted

### *Earl's Court*

- 4.16 Modify the new paragraph proposed to be inserted after 10.1.2, and make changes to 10.1.6:
- 4.17 Proposed changes to new paragraph after 10.1.2: There are five sites along the west of Warwick Road and north of Cromwell Road... The sites are allocated as a the Warwick Road Strategic Site considered in Chapter 25.
- 4.18 10.1.6 Earl's Court Exhibition Centre plays a very important role locally... After 2012, however, the landowners plan to redevelop the site. It is allocated as a strategic site in this Core Strategy, see Chapter 26. The Earl's Court Exhibition Centre Site extends...

### *Kensington High Street*

- 4.19 Modify paragraph 11.1.9 to read:
- 4.20 11.1.9 The Grade II\* Listed Commonwealth Institute building is at the western end of the centre. A high-quality public institutional use could help to enhance the attractiveness of the High Street and attract more visitors. To that end it is included as a strategic site allocation within this Core Strategy – see Chapter 24. A planning application was received in 2009 which included modifications to the building for the Design Museum, with enabling residential development also on the site. The Council is minded to grant permission subject to a s.106 agreement.
- 4.21 *[note: the opportunity has also be taken here to update the text on in the light of the planning application]*

### *Remaining Places*

- 4.22 For the remaining places – Portobello/Notting Hill, Westway, South Kensington, Brompton Cross, Knightsbridge, King's Road/Sloane Square, Notting Hill Gate, Fulham Road and Lots Road/World's End – to insert a new paragraph at the end of the introduction, before the Vision, to read:
- 4.23 There are no strategic site allocations within [name of place to be inserted] place contained in the Core Strategy.

### **Clarification of which sites fall within which places**

- 4.24 It is proposed in Matter 1, question 5, that the table at paragraph 19.1.2 is modified to show which site is in which place. Please refer to that matter for a copy of the proposed table.
- 4.25 It is proposed in Matter 3, Question 1, that there could be a number of beneficial changes to Section 4.4, including clarifying the relationship with the Strategic Site Allocations. Please refer to that matter for the proposed changes.

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#### Matter 3 – Policies for Places: General

##### Question 5

*The vision for Earl's Court includes returning the one-way system to two-way working, but the Chapter advises that no funding is at present allocated. **Should the Vision allow flexibility for an alternative scenario?***

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- 5.0 *The short answer is no. It is the Council's vision that by 2028 the one-way system will return to two way working. The Earl's Court 'Place' and Earl's Court and Warwick Road 'Strategic Sites' set out how this will be delivered, including consideration of alternative sources of funding and alternative scenarios to bring about benefits to the pedestrian environment. The risk of not returning the one-way system to two-way working is included in Chapter 39.*
- 5.1 The Vision for the Earl's Court 'Place' sets out several measures to reintegrate the western edge of the Borough and strengthen Earl's Court Neighbourhood Centre in the form of returning the one-way system to two-way working, reducing traffic flows and improving the pedestrian environment.
- 5.2 In terms of funding, Para 10.3.2 of the Earl's Court 'Place' states that "no funding for this project is at present allocated by Transport for London". However, this does not preclude alternative sources of funding being identified during the plan period to help deliver this part of the vision by 2028.
- 5.3 The Core Strategy makes provision for alternative sources of funding to be made available through infrastructure contributions from development. On this basis, the Core Strategy makes provision for development in the area of the Earl's Court one-way system to investigate and contribute to returning the Earl's Court one-way system to two-way working as an infrastructure requirement in the Earl's Court 'Place' and Earl's Court and Warwick Road 'Strategic Sites'. This reflects the fact that at present the extent to which the one-way system can be returned to two-way working, the likely costs and the sources of funding are not confirmed. This is considered further under Matter 6, Question 3.
- 5.4 The lack of investment to return the Earl's Court one-way system to two-way working is also identified as a risk in Chapter 39 of the Core Strategy. However, the likelihood and impact on the strategy of this risk occurring is considered 'medium' and therefore a potential alternative has not been identified. It is also not linked to a specific quantum of development coming forward and this is also another reason for not developing a Plan B. Returning the one-way system to two-way working is to

improve the environment for residents and visitors to Earl's Court, but its implementation is not critical to the strategy as a whole and it has been dealt with on this basis.

- 5.5 The Council will be discussing the issue of the Earl's Court one-way system with the agents acting on behalf of the landowners, at which point the Council's policy requirements may be slightly clarified through a Statement of Common Ground

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

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#### Matter 3 – Policies for Places: General

##### Question 6

*The Thames Policy Area is a strategic policy area in the London Plan and is subject to development pressures and policy constraints. Should there be a separate 'Place' for the Thames area?*

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- 6.0 *No, there should not be a designated 'Place' for the Thames area. It would not accord with the purpose of the 'Place' designations in the Submission Core Strategy and would bring little additional benefit to the area. The portion of the Thames Policy Area within the Royal Borough is not subject to significant development pressures and the only significant development that is likely to occur is in the Lots Road and World's End area which is already catered for as a specific 'Place.' The stretch of the River Thames between Chelsea Bridge and World's End will be subject to little change and the policy constraints are already well established. The Thames Conservation Area Proposals Statement (adopted 1983) identifies important views, provides adequate protection for the area and has a schedule of detailed enhancement works to the Chelsea Embankment.*
- 6.1 As stated at paragraph 4.4.1 of the Submission Core Strategy the 'Places' selected for inclusion in the Core Strategy are those where significant change is planned and the district, major and international town centres which are the focus for activity. The Thames Policy Area does not fall into this category and the need for 'Place Shaping' which is at the heart of this designation is not substantive enough to merit such an approach. 'Place Shaping' requires that different plans and programmes from across the Council and its partners are integrated. In the case of the Thames area, whilst it is acknowledged that policy constraints need to be respected, there is simply not enough activity planned for the Chelsea Embankment for it to become a 'Place'.
- 6.2 The River Thames is dealt with in some detail in the Submission Core Strategy. The policies that have been included deal adequately with the policy constraints and the opportunities that might be available. With regard to Thames views Policy CL1 (e) provides the high level strategic policy for specific views. It resists development which interrupts, disrupts or detracts from strategic and local vistas, views and gaps. The more detailed views policies (CD1 and CD2) are recommended to be retained in the Unitary Development Plan and these will be incorporated into a 'Views' SPD which has been timetabled in the Local Development Scheme. With regard to other aspects of the River Thames, Policy CL1 (d) requires riverside development to enhance the waterside character and setting including opening up views and

securing access to the waterway. However, outside the Lot's Road/World's End 'Place' and the redevelopment of Lots Road Power Station development opportunities are extremely limited. Thames Water will be constructing the Thames Tideway Tunnel and there will be temporary construction works associated with this development. However, Policy CE2 (h) adequately deals with mitigation measures and the designation of the Thames area as a 'Place' would do little to assist in this process.

- 6.3 With regard to specific comments from the Chelsea Society the provision of additional crossing facilities across the Embankment Road and a designated cycleway (if they were considered appropriate) could be achieved without the Thames area becoming a 'Place' and Policy CT1 of the Submission Core Strategy provides the mechanism for achieving this together with Corporate and Partner Actions.
- 6.4 To conclude the policy constraints for the Thames area are well established and will be augmented with the adoption of the 'Views' SPD. Development opportunities are limited outside of the Lot's Road/World's End 'Place' and any potential works that do occur are adequately catered for in policies contained within the Submission Core Strategy. On this basis there is no justification to designate the Thames area as a 'Place.'

## 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 3 – Policies for Places: Specific

##### Question 7

###### *Earl's Court Place*

- i. Has consideration been given to the sustainability of the local residential community?
- ii. Should there be a reference to the importance of the Warwick Road Corridor?

###### *Latimer and North Kensington Sports Centre:*

- iii. Does the Vision ignore affordable housing and associated infrastructure?
  - iv. Should there be reference to improved transport and community safety?
  - v. Is the proposal for a new shopping centre at Latimer Road Station unsound?
- 

7.0 *Each of the individual questions are deal with in turn below.*

- i. **Has consideration been given [in Earl's Court Place] to the sustainability of the local residential community?**

7.1. *Yes, this is considered in a number of policies in the Core Strategy.*

7.2. The issue of infrastructure requirements for Earl's Court is considered within Core Strategy Policy C1 (Infrastructure Delivery and Planning Obligations – Chapter 29); Earl's Court 'Place' (Chapter 10); Policy CA7 (Earl's Court Strategic Site – Chapter 26); the Infrastructure Schedule (Chapter 37) and the Council's S106 Planning Obligations Supplementary Planning Document. The Council is also producing a joint Supplementary Planning Document with London Borough of Hammersmith and Fulham (LBHF) and the Greater London Authority (GLA) for the proposed Opportunity Area, where site specific infrastructure requirements will be identified and set out as requirements.

7.3. Core Strategy Policy C1 sets out the Council's policy for infrastructure delivery and planning obligations over the entire Borough. This policy sets out various measures for the Council to secure infrastructure provision through planning obligations to overcome the potential costs created by a development. The policy sets out a range of measures, though these are not exhaustive. Any funds secured through planning obligations would have to comply with Circular 05/2005 "Planning Obligations" and the statutory tests for planning obligations set out in the Community Infrastructure Levy regulations 2010. The response to Matter 2, Question 6 considers the detail with regard to planning obligations. It explains that the draft Planning Obligations SPD which contains further details of requirements is near adoption, and will be adopted prior to adoption of the Core Strategy.

- 7.4. The Borough-wide infrastructure requirements are also identified in detail in the Local Infrastructure Delivery Plan (Jan 2010), which reflects discussions with the Mayor of London on the regional and sub-regional infrastructure requirements.
- 7.5. Para 10.4.3 of the Earl's Court 'Place' already requires the following infrastructure to deliver the vision for Earl's Court: affordable housing; community facilities; investigating and contributing to returning the Earl's Court one-way to two-way working; possible expansion of the Abingdon Health Centre; improved public transport and pedestrian interchange; and new public open space, including biodiversity.
- 7.6. Policy CA6 sets out the Strategic Site allocation for the Warwick Road Strategic Site, which identifies the following infrastructure and planning obligations to be delivered through the redevelopment of the 5 sites that make up this Strategic Site: affordable housing; social and community facilities; community sports hall; health facilities; crèche and education facilities; landscape and streetscape improvements; pedestrian and cycle improvements; a Safer Neighbourhood unit; and a contribution to investigate and implement measures to facilitate the return the Earl's Court one-way system to two-way working-unravelling the Earl's Court One-Way system. This policy also makes provision for other infrastructure contributions to be identified through the Planning Obligations Supplementary Planning Document. The Warwick Road Planning Brief Supplementary Planning Document, adopted January 2010, also sets out likely infrastructure provision required through planning obligations in Chapter 7.
- 7.7. Policy CA7 sets out the Strategic Site allocation for the Earl's Court Strategic Site, which identifies the following infrastructure and planning obligations to be delivered through the redevelopment of the strategic site: community and health facilities; new public open space; highway contributions; improvements to public transport accessibility and pedestrian access; provision of affordable housing; and education facilities. This policy also makes provision for other infrastructure contributions to be identified through the Earl's Court and West Kensington Opportunity Area Supplementary Planning Document, which is a joint SPD being prepared by the London Borough of Hammersmith and Fulham; the Royal Borough of Kensington and Chelsea and the Mayor of London.
- 7.8. Chapter 37 of the Core Strategy (pages 247 to 249) sets out a schedule of the infrastructure requirements for various parts of the Borough, which will be continually monitored through the Infrastructure Delivery Plan mentioned above.
- 7.9. The Council's response to Matter 6, Question 1 sets out the justification to support the range and type of uses associated with a new centre in the Earl's Court and West Kensington Opportunity Area.
- 7.10. On the basis of the above, it is concluded that full consideration has been given to infrastructure provision for the existing and new residential communities which comprise of the Earl's Court 'Place'.

**ii Should there be a reference [in Earl's Court Place] to the importance of the Warwick Road Corridor?**

- 7.11. *Yes, with wording proposed to the Inspector following Regulation 27 consultation.*
- 7.12. During the Submission consultation in October 2009 DP9 on behalf of Brookfield proposed the following wording: *"The Warwick Road is located to the north of Cromwell Road and comprises 5 large sites incorporating retail, residential and commercial uses. The corridor is earmarked for high density residential led mixed use development, with a number of the sites subject to proposals and/or planning permission for major redevelopment."*
- 7.13. RBKC responded by stating *"Agree changes to introduce the current situation at Warwick Road. However disagree with making reference to density."*
- 7.14. The Council agrees that reference should be made to the importance of Warwick Road and the mix of land uses. However, reference to the "High density residential led development" is vague and misleading if quoted within the introduction to the 'Place'. This is set out in significant detail in the Strategic Site allocation for Warwick Road.
- 7.15. The Council has therefore proposed the following paragraph after 10.1.2 of the Submission Core Strategy, which the Inspector will be asked to consider: "There are 5 sites along the west of Warwick Road and north of Cromwell Road where significant change is planned. This is likely to be in the form of a mixed use development, with increased provision of open space and education facilities. The sites are allocated as a Strategic Site, considered in Chapter 25."

**iii Does the Vision [for Latimer] ignore affordable housing and associated infrastructure?**

- 7.16. *No: the vision does not ignore these matters. It is explicit about the social infrastructure needed. The provision of both affordable housing and social infrastructure are required for effective and high quality estate renewal, a central part of both the Latimer Place and of the wider Core Strategy. However, if the inspector is minded to, the vision could be clarified with regard to the tenure of new housing.*

**Affordable Housing**

- 7.17. There is an absolute and explicit commitment within the Latimer Place to the provision of social housing. The 'Diversity of Housing' section explicitly refers to the provision of housing, with para 9.3.9 stating that "one way of raising funds to provide good quality homes for existing tenants is through the provision of additional private housing on existing Council-owned housing estates". This also refers to the Housing policies elsewhere within the Core Strategy, with Policy CH4 of the Core Strategy specifically considering estate renewal and being directly relevant for the Latimer area. It is explicit with regard affordable housing. Part (a) states that

the Council “requires a reasonable amount of affordable housing, with the minimum being no net loss of existing social rented provision”. Part (b) states that the Council will “guarantee all existing tenants an opportunity of a home, with those wishing to stay in the area being able to do so.” However, the Council recognises that there is no explicit reference to the provision of affordable housing in the Latimer Vision, and there is some risk, therefore, of the vision being misinterpreted.

- 7.18. The Council does not wish to give the impression that affordable housing will not be a key element of the future regeneration of the Latimer area, and therefore, if the Inspector is minded to do so, the Council would not object to amending the first part of the vision to read:

“Latimer will have been rebuilt, in a phased way, to a new street pattern, guaranteeing all existing tenants the opportunity of a new home as well as creating capacity for new residents to move to the area. It will be a place ....”

### **Social infrastructure**

- 7.19. The Latimer vision specifically refers to a number of elements of social infrastructure required in the Latimer area: the sports centres, the new academy and a new town centre. This is not intended to be a complete list, and there is no suggestion that it should be interpreted as such with para 9.3.11 specifically stating that “good open space and community facilities will also be expected in any new development”.

- 7.20. It is useful to consider each of the three main social infrastructure projects in turn.

#### *The provision of a new neighbourhood shopping centre based around the Ladbroke Grove London Underground station*

- 7.21. Kensington and Chelsea is a densely developed borough containing ten higher order centres and some thirty-five smaller neighbourhood centres. This is one of its strengths, with most people who live within the Borough being within easy reach of the shops and services needed to meet their day-to-day needs. However, not all areas are as well served as others, and to this end, the Council has mapped areas of deficiency for local shopping facilities, i.e the parts of the Borough more than 400 m (or a five minute walk) from a neighbourhood or higher order centre. Just 25 % of the Borough is considered “deficient”. This includes much of the Latimer area. The creation of a new neighbourhood centre in the Latimer area will help meet this deficiency, its raison d’être being to meet the day-to-day needs of residents of the area.

- 7.22. This map illustrating deficiency is included as page 167 of the Submission Core Strategy (Keeping Life Local).

- 7.23. The Council has commissioned Nathaniel Litchfield and Partners to carry out a Retail Needs Assessment to consider, amongst other matters, the ‘need’ for additional retail floorspace across the Borough. This study was published in July 2008. This study concluded that there was minimal need for new comparison floorspace in this part of the Borough to 2015. However, there was some need for additional

convenience floorspace, with the study predicting that there was a 'need' of approximately 2,500 sq m between 2008 and 2015, or 4,600 sq m between 2008 and 2020 across the Borough. This 'need' is in addition to that expected to be provided on the Lots Road Power Station Site in the south-western corner of the Borough.

- 7.24. Some of this need could be accommodated in the Latimer Area.
- 7.25. The creation of a centre, containing a concentration of shops and other social and community uses, is considered to better meet the day-to-day needs of residents than the provision of isolated shops and small parades. Collections of shops and other 'town centre' uses 'feed off' the footfall created, and can therefore provide the variety of mutually supporting uses needed by residents of the Latimer area.
- 7.26. As set out in the LDS, it will be for a subsequent document in the LDF to determine the size of this centre, to determine the quantity and nature of the floor space sought (be this for comparison or convenience retailing) and its scale. The centre must be of a size which provides for local need yet does not have a detrimental impact on neighbouring centres. The scale is dependent on the 'retail need', which in itself is partially dependent on the scale of future estate renewal, and the intensification of residential and/or commercial uses.

*The Kensington Academy*

- 7.27. Para 9.3.12 of the Latimer Place considers the need for a new academy in the area to serve the education needs of Borough residents. An allocation has been included in Chapter 23, the North Kensington Sports Centre, (Policy CA4) for "a new academy with a minimum floor area of 10,000 sq m".

### *North Kensington Sports Centre*

- 7.28. Both the vision and the main body of the Latimer Place refer to the need to improve leisure facilities in connection with the North Kensington Sports Centre. As with the new school, an allocation has been included in Chapter 23, the North Kensington Sports Centre, (Policy CA4) for “a refurbished or relocated sports centre on site, with equivalent sports facilities to the existing centre, including a swimming pool and other facilities identified through a demand assessment, built in a way that is flexible for the future.”

### *North Kensington Academy and Leisure Centre Site as a whole*

- 7.29. The Council has commissioned a feasibility study on entire site, expecting to report to Cabinet later this summer.
- 7.30. An SPD will be prepared for the whole site. This will consider the provision of both a new academy and appropriate sports facilities. This forms part of the Council’s adopted LDS, and is due to be consulted upon Autumn 2010.

### *Additional provision*

- 7.31. Policy C1 (Infrastructure Delivery and Planning Obligations) considers the detailed social infrastructure requirements resulting from estate renewal. This states that “new development will be coordinated with the provision of appropriate infrastructure to support the development. The Council will require that there is adequate infrastructure to serve developments, including through the use of planning obligations.” The policy also recognises that “infrastructure” includes “social, physical, green or environmental infrastructure.”
- 7.32. More detail is provided within the Council’s S106 Planning Obligations SPD due to be adopted in July 2010. It is not considered appropriate to include reference to this within the vision.

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

- 7.33. *No: the Council considers that the creation of a new neighbourhood centre based around the Latimer Road Underground Station is supported by credible evidence and is deliverable. Its function will be to serve the day-to-day needs of residents and those working in the area.*

### **Function of the new centre**

- 7.34. The Council is explicit. The function of the new centre based around Latimer London Underground station will be to serve the day-to-day needs of local people. The vision for Latimer (CV9) states that “new development, including a new neighbourhood shopping centre, will be located around Latimer Road Station”, with para 9.3.11 of the Latimer Place, stating that “a new local shopping centre is needed to allow residents to have the shops and services they need within a short walk.”
- 7.35. The *raison d’être* of a neighbourhood centre, is, as the name suggests, to support the day-to-day needs of local people (para 31.3.12). The function of these centres is

also confirmed within Annex A of the London Plan which states that neighbourhood centres “provide services for local communities”.

- 7.36. There is no intention (or policy framework) for the creation of a larger district centre, although it is recognised that the principal function of a district centre is also to serve the needs of local people.
- 7.37. As set out in the Council’s LDS it will be for a subsequent documents in the LDF to determine the size of this centre, the quantity and nature of the floor space sought (be this for comparison or convenience retailing) and its scale. The centre must be of a size which provides for local need yet does not have a detrimental impact on neighbouring centres. The scale is dependent on the ‘retail need’, which in itself is partially dependent on the scale of future estate renewal, and the intensification of residential and/or commercial uses.

### **Need for a new centre**

- 7.38. Kensington and Chelsea is a densely developed borough containing ten higher order centres and some thirty-five smaller neighbourhood centres. This is one of its strengths, with most people who live within the Borough being within easy reach of the shops and services needed to meet their day-to-day needs. However, not all areas are as well served as others, and to this end, the Council has mapped areas of deficiency for local shopping facilities, i.e the parts of the Borough more than 400 m (or a five minute walk) from a neighbourhood or higher order centre. Just 25 % of the Borough is considered “deficient”. This includes much of the Latimer area. The creation of a new neighbourhood centre in the Latimer area will help meet this deficiency, its raison d’être being to meet the day-to-day needs of residents of the area.
- 7.39. This map illustrating deficiency is included as page 167 of the Submission Core Strategy (Keeping Life Local).
- 7.40. The Council has commissioned Nathaniel Litchfield and Partners to carry out a Retail Needs Assessment to consider, amongst other matters, the ‘need’ for additional retail floorspace across the Borough. This study was published in July 2008. This study concluded that there was minimal need for new comparison floorspace in this part of the Borough to 2015. However, there was some need for additional convenience floorspace, with the study predicting that there was a ‘need’ of approximately 2,500 sq m between 2008 and 2015, or 4,600 sq m between 2008 and 2020 across the Borough. This ‘need’ is in addition to that expected to be provided on the Lots Road Power Station Site in the south-western corner of the Borough.
- 7.41. Some of this need could be accommodated in the Latimer Area.

### **Why a centre rather than isolated shops?**

- 7.42. It is theoretically possible to meet ‘need’ for new retail floorspace (and for social and community uses) within individual premises. Accordingly Policy CF1(c) of the Core Strategy permits new shops (with a floor area of less than 400 sq m (GEA)) in areas of

retail deficiency. This is of a size which equates to a small 'local format supermarket' but is not of a size that is likely to threaten the viability of existing centres. However, a centre, containing a concentration of shops and other social and community uses, is considered to better meet the day-to-day needs of residents than the provision of one or more isolated shops. Collections of shops and other 'town centre' uses 'feed off' the footfall created, and can therefore provide the variety of mutually supporting uses needed by residents of the Latimer area. Concentrations of town centre uses with centres, is one of the central tenets of PPS4's 'town centre first' approach.

**v Should there be reference to improved transport and community safety [in Latimer]?**

7.43. *No: the Council does not consider that specific reference to community safety or improved transport needs to be made in the vision for the Latimer area. These issues are implicit in the reference to excellent urban design, and are both issues considered elsewhere within the Core Strategy. The Council is concerned that their inclusion within the vision would lead to the need to include other generic issues such as inclusive design, sustainability and the like, losing the focus on the specific changes to the place itself.*

**The nature of the existing vision**

7.44. The Council's vision for Latimer concentrates on the 'big ambition' for the area. This does not mean that other issues, such as transport and community safety are not significant, rather that they do not need to be included within an over arching vision.

**Transport links**

7.45. The importance of improving transport links in the area is set out within the Better Travel Choices section of the Latimer chapter, with para 9.3.18 noting that "improvement to pedestrian links over the West Cross Route and West London Line could greatly improve access to the public transport network by opening up the underground and bus services to the west."

7.46. Furthermore, wider improvements to public transport are a major part of the rest of the plan, with Policy CT1 (i) (Improving alternatives to car use), stating that "the Council will work to ensure that public transport services, and access to them, are improved, giving priority to north-south bus links and areas that currently have lower levels of accessibility".

**Community safety**

7.47. The Council considers that community safety is an integral part of 'good design', and as such is a key criteria in the Engaging Public Realm chapter of the Core Strategy Part (f) of Policy CR1 (Street Network) states that the "Council will require new streets to be designed to be attractive, safe, minimise opportunities for crime, and be inclusive to all." Policy CL2 (New buildings, extensions and modifications to new buildings) is also relevant, with CL2(a) vi) stating that development must be "inclusive – accessible to all", and (a)vii) stating it should be "secure – designs out crime".

**Possible amendment**

7.48. Whilst the Council does not consider that a change is necessary (for the reasons set out above), were the Inspector minded, the Council would not object to amending the vision to read,

"Latimer will have been rebuilt, in a phased way, to a new street pattern. It will be a place that focuses on the provision of high-quality services through excellent architecture and urban design. It will provide accessible, safe and adaptable spaces

that are valued and used by the local community. New development, including a new neighbourhood shopping centre, will be located around Latimer Road Station. The area will be better served by public transport, and there will be clear links to Ladbroke Grove and White City.... ”