

Policy Formulation Report

Royal Borough of Kensington and Chelsea

November 2009

1.0 INTRODUCTION

- 1.1 The Council has produced a policy formulation matrix which considers evolution of the policies within the submission Core Strategy. It lists each of the options for policies, or the proposed policies themselves, at each stage of the process and sets out how these have been taken forward in the process. Where an option has not been taken forward the matrix succinctly explains why.
- 1.2 This policy formulation report should be read in conjunction with the reasoning matrix. Its intention is threefold; to summarise the main alternatives and the results from the consultation and to put this in the context of any guidance which is of particular relevance; to make links to the Kensington and Chelsea Partnership's Community Strategy; and to link to the results of the Council's Sustainability Appraisal (SA).
- 1.3 The Council did not offer a series of 'options' for the Places, as each place vision is made up of a range of different actions. The public were, however, given the opportunity to reject or support the vision as a whole, or its constituent parts.

2.0 PLACES

Kensal 'Place'

- 2.1 Kensal represents one of the Borough's largest opportunities for wide scale regeneration. With the addition of a Crossrail station, benefits are likely to extend into neighbouring boroughs and positively contribute to regeneration throughout north/west-central London.
- 2.2 Several options have been presented for Kensal throughout various iterations of the Core Strategy. Originally, consultation on the North Kensington Area Action Plan asked the question as to whether regeneration should result in modest, medium or significant change. Overwhelmingly support was for significant change, and as a result, the 'Towards Preferred Options' consultation looked at what type of development could take place. Again, three options were presented. The first suggested residential-led development with the potential of

accommodating up to 5,000 new homes, a mixed use scheme able to deliver 2,500 dwellings and 450,000m² of commercial floorspace, or a single use campus for a hospital, educational institute or similar.

Support was fairly balanced in favour of the mixed use and campus uses. Due to the need to extract value from the campus, plus the need for all site owners to develop their sites in unison, a mixed use scheme has been favoured.

- 2.3 The mixed-use approach was considered as the most practical and suitable option for Kensal. It is the option most likely to deliver a Crossrail station as it will have a continual use throughout the day, not just at rush hours and will also be in keeping with the proposed density of development in the north of the Borough. The use also facilitates an extended retail offer and a variety of social community uses which should stimulate an engaged local community.
- 2.4 This approach is supported by key stakeholders and the Sustainability appraisal (SA) suggests that a comprehensive mixed use redevelopment will deliver significant benefits to an area in need of regeneration. The SA also states that although redevelopment on a large scale would require considerable expenditure of energy during construction, a development with an emphasis on sustainability would bring significant improvements in building energy efficiencies, public transport infrastructure and provide opportunities for the incorporation of renewable technologies. Further to this, the SA states that Kensal, as a 'Place', has shown significant positive impacts on climate change, transport, cultural heritage and the economy.
- 2.5 It should be noted that the Mayor also notes the potential of Kensal and has designated it as an Opportunity Area in the Consultation Draft version of the London Plan. These are areas which are designated because they have significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility.

Golborne/Trellick 'Place'

- 2.1 The early stages of the Core Strategy included the Golborne/Trellick spatial area as a 'Place' within the North Kensington Area Action Plan. Given that the Golborne/Trellick area contains two strategic allocations (Wornington Green and the Edenham Site) it was considered that it should be included as a 'Place' in its own right to ensure it was in-line with requirements to deliver these allocations, and in recognition of the wider area development needs.
- 2.2 During the consultation on the North Kensington Area Action Plan, there was some support for the option of moderate change, and a recognised need for further change in parts, e.g. at Wornington Green.

- 2.3 The findings from this consultation informed the preparation of the vision, and priorities for action. As a result there were few comments received from the 'Draft Core Strategy' consultation. These resulted in minor wording changes made to the vision for the area which reflect comments regarding the importance of the Golborne Markets and the need to balance social and community needs.
- 2.4 The SA shows that the vision for Golborne/Trellick has a positive impact for the majority of the environmental SA objectives. Impacts on the climate change, energy efficiency and waste SA objectives are likely to be enhanced through implementation of the Climate Change and Waste policies. The community facilities, housing and health social SA objectives showed positive impacts. The SA states that measures to improve access to the waterway should be recognised and the Council took this into consideration and included appropriate references.
- 2.5 The Council is satisfied that the chosen allocation maximises the potential of the site, providing the opportunity to restore Trellick Tower, a unique building, further contributing to the regeneration of the wider area.

Portobello/ Notting Hill 'Place'

- 2.6 Officers have long been aware of the special character of the Portobello Road and the place it has in the hearts of many of the Borough's residents. The need to maintain the special character of the Portobello Road was one of the driving forces behind the Council's Retail Commission.
- 2.7 The vision for Portobello reflects the need to maintain its special character. To meet the needs of the local people and the thousands of visitors and to support a diversity of shops, the antiques trade and the market. No other vision was a possibility, given the strength of public opinion and the desire that the Council has to enhance the special character of the area.
- 2.8 Whilst the Portobello vision didn't offer a series of discrete alternatives, the earlier NKAAP consultation did inform its development. This consultation offered three options of the area, 'modest', 'moderate' or 'significant' change. The 'modest' option involved initiatives to try to maintain the diversity and character of the centre, with the medium and significant options including the initiatives to maintain diversity and proposing eastward or eastward and northern expansion respectively.
- 2.9 There was whole hearted support for initiatives to maintain the diversity of the Portobello Road, but less support for either the northward or eastward expansion, with consultees concerned that expansion could dilute the special offer of the Portobello Road.

- 2.10 This concern was taken forward into the initial ‘Places’ consultation when a draft vision was introduced, although there was some support for initiatives to draw visitors up the Portobello Road to Golborne. These initiatives did not necessarily require an expansion of the retail offer. In addition there was a whole hearted rejection of the redevelopment of Portobello Court to introduce a new supermarket into the area. Other concerns related to the need to emphasise the importance of the antiques trade and the market in the special character of the centre, and enhancing the role of the shops which support the day-to-day needs of residents of the area. These concerns were taken on board in the final vision.
- 2.11 The Community Strategy does not consider specific places. However, the central tenet of the vision for Portobello which is to maintain a strong centre with a distinct identity, is supported by the aims within the “Work and Business section” of the document, in particular (i) of Aim 1 (to create and maintain an attractive business environment) which states that the Kensington and Chelsea Partnership (KCP) “seek to offer a range of business, offices and retail premises to suitable different budgets and different needs.”
- 2.12 The Sustainability Appraisal notes that the potential opportunities for Portobello/ Notting Hill have shown positive impacts for the previously developed land, transport, waste and cultural heritage environmental SA objectives. The majority of social SA objectives showed positive impacts. The economy SA objective showed a significant positive impact.
- 2.13 The Council is therefore satisfied that the vision for the area reflects the desires of the relevant stakeholders, complies with the rest of the Core Strategy and scores favourably within the Sustainability Appraisal.

Westway ‘Place’

- 2.14 The earlier stages of the Core Strategy did not include ‘Land along the Westway’ as a ‘Place’. However, it was considered this area of land should be included as a ‘Place’ to ensure that the needs of the community, and the environment can be met. The Westway Development Trust is charged with delivering community based facilities within the area underneath the flyover, which itself is a contributor to physical and environmental problems.
- 2.15 No comments which questioned the soundness of the ‘Place’ designation were received. Some small changes were made in response to the Westway Development Trust’s comments to more closely align the vision and aims with the Trust’s own longer-term development plan.
- 2.16 The Sustainability Appraisal (SA) shows that the vision for the Westway has positive impacts for the economy, biodiversity, parks &

open spaces, previously developed land, transport and cultural heritage environmental, and community facilities social SA objectives.

- 2.17 The Council is therefore satisfied that the vision for the area reflects the desires of the relevant stakeholders, complies with the rest of the Core Strategy and scores favourably within the Sustainability Appraisal (SA)

Latimer ‘Place’

- 2.18 The Latimer area represents an area dominated by outmoded social housing built around an awkward and uninviting street network, sports facilities which in the longer term will no longer be fit for purpose and an Employment Zone under threat from large office development. The mitigation of these issues are crucial and thus the Latimer ‘Place’ is a fundamental component to the delivery of the Core Strategy’s overall vision.
- 2.19 The vision for Latimer promotes the regeneration of the area over the lifetime of the plan, the development of a new neighbourhood centre based around the Latimer London Underground Station, the creation of a new Academy and the retention of a community sports centre in the area.
- 2.20 The bones of the vision were developed at the North Kensington Area Action Plan (NKAAP) ‘Issues and Options’ consultation which set out three options for the area; ‘modest’ , ‘medium’ or ‘significant’ change. The ‘modest’ change option largely equated to continuing with the status quo, the ‘medium’ change option was for the redevelopment of one or two estates and a moderate increase in retail provision, and the ‘significant’ option including significant redevelopment of several estates together with the sports centre, a new neighbourhood centre and new high quality open space.
- 2.21 The majority of respondents were in favour the ‘significant’ redevelopment option with particular reference to the positioning of a new supermarket/shopping hub at the Latimer Road Station. The vision which has been developed reflects these desires.
- 2.22 There was general support for the vision as drafted in the ‘Places’ document, a vision which included elements of both the medium and significant change options, although there was a call for more clarity concerning the future of the sports centre and swimming pool. The vision was amended accordingly to clarify the situation.
- 2.23 The vision reflects the aims of the Community Strategy; with the re-provision of leisure facilities being supported by Aim 4 of the ‘Culture, Arts and Leisure’ chapter of the Community Strategy; a new school being supported by Aim 1 of the ‘Achieving Potential’ chapter, and sensitive redevelopment of the housing estates supporting the aims within the ‘Homes and Housing’ chapter.

- 2.24 The SA concluded that the vision for the Latimer ‘Place’ shows potentially positive impacts on the economy, climate change, air quality, parks & open spaces, previously developed land, transport and the provision of community facilities. There are some questions raised concerning dust and noise problems associate with the transport links running across the area. The SA does, however, recognise that these are issues which are outside the Council’s control. The SA also refers to the implication of the vision for healthcare and crime, as neither issues are directly referred to. The Council recognises that both issues are of importance, and are considered elsewhere in the Core Strategy under specific policies. All development will need to be designed to include measures to improve community safety, whilst the provision of healthcare is central to the Council’s ‘walkable neighbourhood’ concept.
- 2.25 The Council is satisfied that the vision for Latimer reflects the ambitions of the Core Strategy, the desires of many of the local residents and businesses and is “sustainable” in terms of the Council’s Sustainability Assessment.

Earl’s Court ‘Place’

- 2.26 The Earl’s Court Exhibition centre was considered at the “Interim Issues and Options” stage. The Earl’s Court ‘Place’ was introduced within the “Towards Preferred Options” iteration of the Core Strategy, to reflect its importance at both borough and London-wide level.
- 2.27 The “Towards Preferred Options” stage dealt with a number of issues including the unravelling of the Earl’s Court One-Way-System, connectivity to the site and the whole area, pedestrian access from Warwick Road and the future of Brompton Cemetery. Three alternative options for Earl’s Court were postulated at the ‘Towards Preferred Options’ stage: an office-led mixed use development, residential-led mixed use development and a convention/exhibition centre. The alternative chosen was a mixture of the three: a mixed use development of residential and large scale offices with a convention centre at its heart.
- 2.28 This option was chosen as a reflection of the response to the consultation and the SA. Other issues raised in the consultations such as traffic problems, improvements to pedestrian links, community facilities, open space, public realm and the importance that the Warwick Road sites have for the whole area, have all been addressed in the final ‘Places’ chapter in the Core Strategy. Minor changes in the text were made to reflect the vibrant mixed-use nature of the area and the importance of the design in terms of both conservation and residential amenity. Further reference was also made in the text to partnership working with TfL and the fact that a feasibility study for the unravelling of the one-way system was undertaken, but funding has yet

to be allocated. References to the Earl's Court, West Kensington and North Fulham Regeneration areas in the London Borough of Hammersmith and Fulham were made to reflect the H&F desires for these sites in their Issues and Options document (June 2009). A reference to the use of part of the site as a cultural destination (rather than just an exhibition centre) was also added.

- 2.29 Concerns were raised by GLA that the proposed allocation of the site might preclude the proper spatial planning of the whole Earl's Court site and the adjoining land. Changes were made to the text to reflect the concerns. This entails showing a more flexible mixed-use allocation on the site.
- 2.30 Detailed proposals for the area will be included within a joint Supplementary Planning Document (SPD) to be produced by the Royal Borough and the London Borough of Hammersmith and Fulham and work has commenced on this document.
- 2.31 The Community Strategy aims to improve local transport management, services and networks; improve the quality and access offered by local health and social care services; improve the quality of housing across all tenures; increase the type and number of homes to build mixed, balanced and sustainable communities; improve the relevance and accessibility of local services to residents and other service users; support and develop community life and leadership; create and maintain an attractive and vibrant business environment, and improve the quality and accessibility for all of the public open space within the Royal Borough. All these issues are addressed in the Earl's Court 'Place'.
- 2.32 The potential opportunities for Earl's Court have shown significant 'positive impacts on climate change and energy efficiency environmental SA objectives and positive impacts for the majority of remaining environmental SA objectives. The housing social SA objective has shown significant positive impacts and positive impacts for the community facilities and health SA objectives. The economy SA objective showed a positive impact as the proposed development should help support the local economy, and new employment, hotels, leisure, offices, and associated facilities, as part of the wider Earl's Court site, should also have a positive impact on local economy.
- 2.33 The Council is satisfied that the vision for Earl's Court reflects the ambitions of the Core Strategy, the desires of many of the public and is "sustainable" in terms of the Council's SA.

Kensington High Street ‘Place’

- 2.34 The vision for Kensington High Street was originally developed by a team of officers walking around the area to identify what could possibly make the area unique, the specific issues affecting the centre and the options that are available. This was subsequently written up as a draft vision which was discussed at a workshop attended by retailers and other interested organisations and individuals. The vision was amended as a result of this meeting before being put out to formal public consultation.
- 2.35 Most of the comments received related to redevelopment of the Commonwealth Institute and the effect of reduction of the Circle Line service, particularly at weekends. The current developers of the Commonwealth Institute objected to the text specifying a new public institutional use for the building. However, this representation was rejected because the Council is committed this type of use for the site. Another developer ask to include reference to the contribution that the Commonwealth Institute makes to the High Street and its environment in terms of the appearance of the listed building, views, landscaping and openness. The text has been altered to reflect the wording used in the ‘Tent in the Park’ SPD. The Council raised concerns regarding the length of time that the Circle Line was out of service due to engineering works, but it was considered that no more could be achieved via the Core Strategy, although concerns regarding the irregularity of the service were mentioned in the text.
- 2.36 Barclays and the Phillimore Estate objected to the proposed policy which resisted the loss of shops to banks and estate agents and also questioned the suggested policy on cafes and restaurants. Policy CF 11 (within the Fostering Vitality section) has subsequently been rewritten to allow more flexibility with regard town centre uses within town centres in the Borough. This has been reflected in the text of this section. Chelsfield requested that ‘new public institutional use’ of the Commonwealth Institute was changed to ‘new use’, this was rejected, and the inclusion of the Commonwealth Institute site in the Kensington High Street town centre boundary was also rejected, as had never formed part of the centre.
- 2.37 The directing of new large scale retail development to existing higher order town centres is an endorsement of the “town centre first” approach central to PPS6 and to the London Plan. This approach has been supported by a number of the key stakeholders at the various consultations of the evolving document, not least by the Greater London Authority (GLA) and the Government Office for London (GOL).
- 2.38 The Community Strategy does not consider specific ‘Places’. However, the central tenet of the vision for Kensington High Street which is to maintain a strong centre with a distinct identity, is supported by the aims within the “Work and Business section” of the document, in

particular (i) Aim 1 (to create and maintain an attractive business environment) which states that the KCP “seek to offer a range of business, offices and retail premises to suitable different budgets and different needs.”

- 2.39 The SA notes that the Council’s town centre policies generally perform well even against the environmentally focussed SA objectives given the strong development focus of these policies. This stems principally from the focus of development to existing higher order centres which are likely to be easily accessible by public transport.
- 2.40 The Council is satisfied that the vision for Kensington High Street reflects the ambitions of the core strategy, the desires of many of the public and is “sustainable” in terms of the Council’s SA

South Kensington ‘Place’

- 2.41 The vision for South Kensington was originally developed by a team of officers walking around the area to identify what makes the area unique, the specific issues affecting the centre and the options that are available. This was subsequently written up as a draft vision which was discussed at a workshop attended by two of the Exhibition Road institutions and the main landowner in the centre as well other interested organisations and individuals.
- 2.42 The main concerns raised were about preserving the residential character of the surrounding area and text has been added setting out the quality of the residential buildings and squares and acknowledging the village character of much of the retail in the area. The use of the area on the front lawns outside the Natural History Museum as an event space causes much concern to residents. The request for recognition of this area as a green space was not accepted because high footfall means a hard surface may be more appropriate. The area is designated as public open space and so is covered by policies protecting its use in the wider Core Strategy. Imperial College raised specific concerns relating to their estate and the text was changed to recognise their requirements for College Road, the college’s contribution to the vitality and viability of the centre, and that South Kensington is an appropriate location for student housing.
- 2.43 The Natural History Museum pointed out that not all of their buildings were Grade 1 listed and requested the removal of the reference to the East Lawn as a public open space - this was rejected but a reference to the museum’s forthcoming Grounds Strategy has been added, and the map has been changed to show the area currently used for events includes the lawns in front of the Waterhouse building. The Knightsbridge Association objected to the area outside the Museums being described as ‘used as an event space’. However, since this is currently the de facto use and the changes detailed above had been made this change was rejected. At the request of South Kensington

Estates the paragraph on modernisation of South Kensington station has been strengthened, it has also been moved to the ‘Better Travel Choices’ heading as this is more appropriate.

- 2.44 The directing of new large scale retail development to existing higher order town centres is an endorsement of the “town centre first” approach central to PPS6 and to the London Plan. This approach has been supported by a number of the key stakeholders at the various consultations of the evolving document, not least by the GLA and GOL.
- 2.45 The Community Strategy does not consider the museums complex as such. However, the Culture, Arts and Leisure chapter does seek to encourage the active participation in arts and cultural activity, and develop an excellence in artistic practice. Designation of a strategic cultural area is likely to help achieve this aim.
- 2.46 The Sustainability Appraisal notes that the Council’s town centre policies generally perform well even against the environmentally focussed SA objectives given the strong development focus of these policies. This stems principally from the focus of development to existing higher order centres which are likely to be easily accessible by public transport.
- 2.47 The Council is satisfied that the vision for South Kensington reflects the ambitions of the core strategy, the desires of many of the public and is “sustainable” in terms of the Council’s SA.

Brompton Cross ‘Place’

- 2.48 The original list of ‘Places’ did not include Brompton Cross as a ‘Place’. However, given that Brompton Cross is defined as a district centre it was considered that it should be included as a ‘Place’ to ensure it was in-line with PPS 6 which supports all town centres having a vision.
- 2.49 There were few comments received from the ‘Draft Core Strategy’ consultation. As a result, only minor wording changes were made to the vision for the area to reflect NHS comments regarding the importance of supporting local hospitals which have international and national significance rather than simply a local importance.
- 2.50 The Community Strategy does not consider specific ‘Places’. However, the central tenet of the vision for Brompton Cross, which is to “maintain a strong centre with a distinct identity”, is supported by the aims within the ‘Work and Business’ section of the document, in particular (i) of Aim 1 (to create and maintain an attractive business environment) which states that the Kensington and Chelsea Partnership (KCP) “seek to offer a range of business, offices and retail premises to suitable different budgets and different needs.”

- 2.51 The Sustainability Appraisal shows that vision for Brompton Cross shows positive impacts for the majority of environmental SA objectives. Impacts on the climate change, energy efficiency and waste SA objectives are likely to be enhanced through implementation of the Climate Change and Waste policies. The community facilities, housing and health social SA objectives showed positive impacts. The economy SA objective showed a positive impact. The SA stated that sense of identity had not been recognised in the policy; the Council took this into consideration and included a new policy within the Brompton Cross ‘Place’ which makes the reference to having a strong sense of identity.
- 2.52 The Council is satisfied that the vision for Brompton Cross reflects the ambitions of the Core Strategy, the desires of many of the public and is “sustainable” in terms of the Council’s SA.

Knightsbridge ‘Place’

- 2.53 The vision for Knightsbridge was originally developed by a team of officers walking around the area to identify what makes the area unique, the specific issues affecting the centre and the options that are available. This was subsequently written up as a draft vision which was discussed at a workshop attended by retailers and landowners in the town centre as well other interested organisations and individuals, including an officer from the City of Westminster. The vision was amended as a result of this meeting before being put out to formal public consultation.
- 2.54 Most of the concerns raised at this meeting and during the subsequent public consultation related to the high quality residential nature of the area surrounding the centre and the potential for conflict with Knightsbridge’s role as an international centre. In particular there was concern that mentioning the West End as the other international centre in the capital implied an intention to make Knightsbridge more like the West End. The text has been altered to make it clear this is not the case. There was also a view that Knightsbridge should be an up market centre and not cater for mass market tourists, these comments related particularly to the provision of open space, cafes and restaurants. The text has not been changed as requested because it is important to be able to offer customers the full range of services they expect from a shopping centre, including places to rest, eat and drink, so they can take a break and then continue shopping. The section on the potential for expansion of the town centre was also revised to make it clear that specific sites had been identified and that general expansion into residential areas was not envisaged.
- 2.55 The Knightsbridge Association requested that all references to Knightsbridge were changed to Brompton Road, but this was rejected because the centre is identified as Knightsbridge in the Mayor's London Plan retail hierarchy, and it includes the top part of Sloane Street and side streets like Beauchamp Place. There were requests from

residents to remove all references to expanding commercial activities in the centre beyond the main artery of Brompton Road which were similarly rejected. The Knightsbridge Association requested the needs of residents be given at least equal consideration with those of other stakeholders. This was resisted because Knightsbridge is one of only two international centres in the Mayor's London Plan retail hierarchy, so whilst the needs of residents are explicitly recognised in the vision for Knightsbridge any further emphasis on residents' interests would neglect the reality of the role of the centre and a balance needed to be struck. The text was amended to reflect the wording in Westminster's Draft Core Strategy in relation to Montpelier Street although the Knightsbridge Association objected to references to alfresco dining and outdoor leisure. The map has been changed to include the Fire Station in the retail area as the London Fire Service has identified the station as suitable for redevelopment.

- 2.56 The directing of all new large scale retail development to existing higher order town centres is an endorsement of the "town centre first" approach central to PPS6 and to the London Plan. This approach has been supported by a number of the key stakeholders at the various consultations of the evolving document, not least by the GLA and GOL.
- 2.57 The Community Strategy does not consider specific places. However, the central tenet of the vision for Knightsbridge which is to maintain a strong centre with a distinct identity is supported by the aims within the "Work and Business section" of the document, in particular (i) of Aim 1 (to create and maintain an attractive business environment) which states that the Kensington and Chelsea Partnership (KCP) "seek to offer a range of business, offices and retail premises to suitable different budgets and different needs."
- 2.58 The SA notes that the Council's town centre policies generally perform well even against the environmentally focussed SA objectives given the strong development focus of these policies. This stems principally from the focus of development to existing higher order centres which are likely to be easily accessible by public transport.
- 2.59 The Council is satisfied that the vision for Knightsbridge reflects the ambitions of the core strategy, the desires of many of the public and is "sustainable" in terms of the Council's SA.

King's Road/Sloane Square 'Place'

- 2.60 The vision for the King's Road notes that it will not simply be like any other 'successful' high street but will remain one of London's iconic and vibrant shopping streets, containing a lively and diverse mix of shops, restaurants, and world-class cultural attractions.
- 2.61 The special character of the King's Road was endorsed and it was seen as a successful centre which retains much of its character despite

the large number of multiple retailers that it contains. Some of this character was seen to relate to the built form of the area - the juxtaposition between the bustling shopping street and the quiet garden squares and open spaces which opened up one side of the street or the other. The Council was urged to maintain this balance, and to ensure that the commercial uses do not harm the residential amenity of the neighbouring residential properties. In addition, whilst a new station in the King's Road area as part of the proposed Chelsea- Hackney line (Crossrail 2) was seen to have potential to attract more visitors into the centre, there was some concern that Council was in danger of pre-judging the results of the studies necessary to assess the impact on the stations on the Kings Road and the surrounding area. The vision and supporting text was amended accordingly.

- 2.62 Further comments were received on the nature of the “solution” for Sloane Square, with some consultees concerned that any policy should reflect the result of the recent consultation on the area. Other comments were received objecting to the Council’s proposed policy on affordable shops, in relation to the King’s Road.
- 2.63 The Community Strategy does not consider specific places. However, the central tenet of the vision for Kings Road which is to maintain a strong centre with a distinct identity, is supported by the aims within the “Work and Business section” of the document, in particular (i) of Aim 1 (to create and maintain an attractive business environment) which states that the KCP “seek to offer a range of business, offices and retail premises to suitable different budgets and different needs.”
- 2.64 The SA shows the vision for the King’s Road / Sloane Square place as having has having positive impacts for the majority of environmental SA objectives and significant positive impacts for the transport SA objective. There are uncertain impacts for the flood risk SA objective. Impacts on the climate change, energy efficiency and waste SA objectives are likely to be enhanced through implementation of the Climate Change and Waste policies. The majority of social SA objectives showed positive impacts. The economy SA objective showed a positive impact.
- 2.65 The Council is satisfied that the vision for King’s Road reflects the ambitions of the core strategy, the desires of many of the public and is “sustainable” in terms of the Council’s SA.

Notting Hill Gate ‘Place’

- 2.66 Notting Hill Gate is in some need of regeneration to improve its identity and strengthen its retail offer, providing shops and services which cater for the needs of local community. Many of the buildings are unattractive and do little to contribute to a distinctive identity for Notting Hill Gate. The amount of vehicles passing through the centre also negatively impact on the pedestrian environment. Much of the centre is owned by

the Metro Shopping Fund, who have been considering options for the future of the centre. The Centre is designated as a district shopping centre in the London Plan and consultants, Urban Initiatives, have produced the Notting Hill Gate District Centre Framework.

- 2.67 During the consultation on the Portobello, Golborne, Westbourne and Notting Hill Gate areas in the North Kensington Area Action Plan, there was no support for the option of moderate change (refurbish the post-war buildings), and equal support for medium change (reclad the post-war buildings to change their external appearance and improve the street) or significant change (redevelop much if not all of the post war buildings, along with improvements to the street). There were a large number of respondents who objected to Notting Hill Gate being included in the Portobello, Golborne and Westbourne area, suggesting that it should be considered as a separate area. The findings from this consultation informed the preparation of a vision, two further alternatives and several desired benefits in the 'Towards Preferred Options' stage of the Core Strategy. The vision, outcomes and alternatives were generally all well supported, although Metro Shopping Fund (MSF) particularly supported alternative 2 (Predominantly residential and retail) and several respondents suggested that the centre be taken out of the North Kensington Area Action Plan. Several respondents also supported retaining the office function of the centre (alternative 1), which was also not supported by Metro Shopping Fund who would prefer a residential and retail priority within the centre. A suggestion by the Kensington Society was also well supported, which considered enhancing the vibrancy, improving the architectural quality and creating a high-quality, pedestrian-friendly public realm, by reconfiguring the buildings and public realm. The refurbishment of the Coronet Cinema was also raised as a required outcome from development.
- 2.68 The vision for Notting Hill Gate, which proposes a combination of alternatives 1 and 2 from the Towards Preferred Options, set out in the Draft Core Strategy 'Place' was generally well supported. However, the Metro Shopping Fund suggested a number of amendments, such as raising the importance of strengthening the retail function of the centre and the acknowledgment that it's not the existence of coffee shops and restaurants that contribute to the poor quality of the centre, but the 'down market' quality of some of the operators, such as fast food outlets, which do not cater for the local community. The Metro Shopping Fund were keen to encourage urban living within the centre, with which we agree, and the Draft Core Strategy has been amended to reflect these suggestions. We disagree with the Metro Shopping Fund suggestions regarding the need to downplay the role of the centre for offices and the potential to relocate the underground entrances. MSF also considers that, owing to the competition with Westfield and the West End, the centre would benefit from 'uplifting' rather than redevelopment. The Council considers that a simple uplifting scheme is not ambitious enough to deliver a new distinctive

identity for the centre and will not resolve the issues with the existing development.

- 2.69 The Sustainability Appraisal, October 2009, stated that the policy should better reflect the aspirations to improve the pedestrian environment and improve access around the centre and these have been taken into account in the Publication version of the Core Strategy. The SA also suggested that the policy considers proposals to reduce crime. However, this is considered in the Designing out Crime SPD which is applicable on a Borough wide level, and it was not considered necessary to select Notting Hill Gate.
- 2.70 The Council is satisfied that the vision for Notting Hill Gate reflects the ambitions of the Core Strategy vision, the desires of many of the public and is “sustainable” in terms of the Council’s SA.

Fulham Road ‘Place’

- 2.71 The earlier stages of the Core Strategy process did not include Fulham Road as a ‘Place’. However, given that Fulham Road West is defined as a district centre, it was considered that it should be included as a ‘Place’ to ensure it was in-line with PPS 6 which requires all town centres to have a vision.
- 2.72 No comments which questioned the soundness of the place were made and no significant changes were made.
- 2.73 The Sustainability Appraisal shows that the vision for Fulham Road displays positive impacts for the economy, biodiversity, parks & open spaces, previously developed land, transport and cultural heritage environmental, community facilities and housing social SA objectives
- 2.74 The Council is satisfied that the vision for Fulham Road reflects the ambitions of the Core Strategy vision, the desires of many of the public and is “sustainable” in terms of the Council’s SA.

Lots Road/World’s End ‘Place’

- 2.75 This ‘Place’ was taken forward in its entirety from the ‘Issues and Options’ stage to the Publication Core Strategy.
- 2.76 Concerns raised in the ‘Issues and Options’ and ‘Towards Preferred Options’ consultations and the final Regulation 25 consultation (July to September 2009) regarding issues such as overcrowding; congestion; the feeling of isolation from Lots Road; the importance of the employment zone for small business and light industry; the need for further improvements to connectivity; including pedestrian and cycling links and better transport and community facilities were all addressed in the final version of the Lots Road/World’s End ‘Place’ in the Publication Core Strategy. Other issues regarding mixed-use

development, the investigation of the designation of a conservation area in the Lots Road triangle and the importance of the ‘Safeguarded Wharf’ status for Chelsea Wharf were also included in the Publication Core Strategy ‘Place’ as a result of the responses received. Further information obtained from the final Regulation 25 consultation about the late Victorian housing stock, the importance to the area of the Design Centre, the Heatherley School of Art and Cremorne Gardens, were also included in the revised text.

- 2.77 The Community Strategy aims to improve the quality and access to facilities offered by local health authority and social care services; improve the relevance and accessibility of local services to residents and other service users; support and develop community life and leadership; create and maintain an attractive and vibrant business environment; improve the quality of housing across all tenures; increase the type and number of homes to build mixed, balanced and sustainable communities; improve local transport management, services and networks and improve the quality and accessibility of all public open space within the Royal Borough. All these issues are addressed in the Lots Road ‘Place’.
- 2.78 The results of the SA showed mostly positive impacts for the majority of environmental, social and economic objectives. However, it identified that the need for higher quality local shopping and social and community uses such as healthcare had not been recognised sufficiently in the text for the ‘Place’, and therefore these were included. As there were uncertain impacts due to the potential flood risk to the area it was stated in the ‘Respecting Environmental Limits’ section of the ‘Place’ that any development in this area will need to consider the potential flood risk of the River Thames.
- 2.79 The Council is satisfied that the vision for Lots Road reflects the ambitions of the Core Strategy vision, the desires of many of the public and is “sustainable” in terms of the Council’s SA.

3.0 SITE SPECIFIC ALLOCATIONS

Kensal Gasworks Strategic Site

- 3.1 This option for the quantum of development is broadly similar to that detailed under the Kensal ‘Place’.
- 3.2 The option for significant redevelopment was supported by key stakeholders and by the Council’s Pre-Feasibility Study (December 2008). By supporting the need for significant change and seeking to deliver a Crossrail station we consider that the Kensal site holds the key to unlocking North Kensington’s latent potential.

- 3.3 Furthermore, the proposed allocation is supported by the GLA who have designated the Kensal site as an Opportunity Area in the Consultation Draft London Plan. This states that the site has the capacity of at least 2,000 residential units and has an indicative employment capacity of 1,000 by 2031.
- 3.4 The quantum of development has been linked to infrastructure needs in the Publication Core Strategy and will be detailed thoroughly in a future Supplementary Planning Document. (SPD).
- 3.5 The details provided in the Kensal strategic site also performed well in the Sustainability Appraisal stating that “The aim to deliver an ‘exemplary environmentally responsive mixed use development’ should ensure a positive outcome for SA (*environmental*) Objectives.” Furthermore the SA declares that, “The site’s surrounds contain high levels of employment, income and housing deprivation and this is reflected in the understanding that the Gasworks holds the key to significant regeneration in North Kensington. The provision of social and community uses at the site and improvement to the quality of the public realm, as well as the identified s106 requirements for affordable housing contribution (if not provided as part of the development) should help deliver a positive response to the Social SA Objectives.”
- 3.6 On the basis of the above it is considered that the quantum of development is appropriate and is sustainable in terms of the Council’s SA.

Wornington Green Strategic Site

- 3.7 Wornington Green Estate comprises of approximately 538 social housing units, a public park (Athlone Gardens) and various community facilities, including the Venture Centre.
- 3.8 The Kensington Housing Trust (KHT) is considering the redevelopment of the Wornington Green Estate for a variety of reasons, amongst them the difficulty of achieving the ‘decent homes’ standard with the existing stock which forms the estate. The Council, as land owners of the Venture Centre and Athlone Gardens, has agreed that total redevelopment is the only option for the estate and has also agreed to use its assets to facilitate the phasing and to ensure that the development is conducted as quickly as possible and does not unduly disrupt residents and neighbours. The KHT will be looking to use receipts from the sale of market housing and a bid from the Homes and Communities Agency to fund the redevelopment. KHT are proposing to submit a planning application for outline permission and phase 1 of the development towards the end of November 2009.
- 3.9 KHT and other stakeholders have been considering the options for the estate for some time before inclusion in the Publication Core Strategy. These other options include 1) refurbish to the ‘Decent Homes’

standard; 2) full refurbishment and remodelling; 3) refurbishment, remodelling and focused redevelopment; 4) minimum refurbishment, with extensive redevelopment; and 5) full redevelopment (the preferred option).

- 3.10 Wornington Green was identified as a key site in the North Kensington Area Action Plan (Box 5.3), which put forward an option of using private market housing to fund the re-provision of the existing social housing to a much higher standard and also questioned whether any other options would bring about significant improvements to the quality of the existing social housing. There was general support for the option put forward (including support from the GLA), although there was limited support for the exploration of a sensitive refurbishment as a viable option to extensive redevelopment. KHT stressed that if the estate was left as is, the existing housing would become unusable within twenty years. Several respondents generally supported the indicative policy at the 'Towards Preferred Options' stage of the Core Strategy that the Council will be mindful of residents concerns and the case for change made by the Kensington Housing Trust. However, the Labour Group rejected Kensington Housing Trust's proposals to demolish and rebuild the Wornington Green Estate and are currently working with local residents to prepare an alternative and in their view, more innovative vision for the estate.
- 3.11 The Strategic Sites consultation document (May 2009) took forward the option for redevelopment through the allocation of the estate for residential (538 social and a minimum of 150 private units); leisure and community facilities (2,500m²); open space (10,000m²); and tertiary education. This document identified the priorities for the site as a) keeping the community together where current tenants who wish to stay on the estate will be accommodated; b) to ensure that the redevelopment is carried out as quickly as possibly; and c) in terms of outdoor space, require the size of Athlone Gardens to be provided after redevelopment and half of the space of Athlone Gardens to be provided during construction. This consultation document also set out detailed s106 requirements. The site allocation and other details were well supported and taken forward in the final Regulation 25 consultation of the Draft Core Strategy, and this was complemented with requirements for a Combined Heat and Power Network in accordance with the 'Respecting Environmental Limits' policy and requirements to replace the storage used by the market traders in Munro Mews. In response to the final Regulation 25 consultation on the Draft Core Strategy, the allocation in the Publication version was amended to remove the tertiary education facility as this will not form part of the redevelopment, but it includes requirements for a phased scheme and clarifies the situation with regards to the retail provision along Portobello Road.
- 3.12 The Community Strategy aims to increase the type and number of homes in the borough in order to build mixed, balanced and

sustainable communities and it is considered that the strategic site allocation and the aims of the redevelopment are in accordance with this objective.

- 3.13 PPS3 does not specifically refer to estates. The London Plan does not have a policy on estate renewal but paragraph 3.75 sets out the Mayor's approach to estate renewal. For example it is stated that any estate renewal should result in existing housing being replaced by better quality accommodation, providing at least an equivalent floorspace. The policy is consistent with the London Plan approach.
- 3.14 The SA states that the redevelopment should assess the site potential for improving waste management. This is considered as part of the Wornington Green SPD.

Land adjacent to Trellick Tower Strategic Site

- 3.15 Although a relatively small site, the 'Land adjacent to Trellick Tower' has been allocated as a Strategic Site given its fundamental role in achieving the vision for the Golborne/Trellick 'Place'. It also encompasses the former Edenham Care Home.
- 3.16 The proposed allocation includes land use for a minimum of 60 residential units to help fund the restoration of Trellick Tower, and improved social and community uses for the area. The restoration of Trellick Tower is crucial to other themes of the Core Strategy, particularly *Renewing the Legacy* and as such there are no alternative options which have not already been explored. Detailed guidelines for the site will provided in the forthcoming Supplementary Planning Document. (SPD).
- 3.17 Few representations were received on this strategic allocation. Representations were received from the Golborne Society who were concerned that the allocation excluded the re-provision of a care home, although health provision in general is catered for as a possible use as part of the site allocation.
- 3.18 The Health and Social Care, and Homes and Housing sections of the Community Strategy support the provision of residential and health uses. Aim 2 of Health and Social care looks to increase the choices that local people have about where, when and how they access health care, while Aim 4 ensures that services are equitably provided to the whole population, and to reduce any inequalities in access to the quality of services. On this basis health provision would be supported, although this may not necessarily be in terms of a care home, but could be for primary healthcare facilities.

- 3.19 In terms of the Council's Sustainability Appraisal (SA), the proposed allocation is considered to have a positive impact upon both the social and economic sustainability objectives.

North Kensington Sports Centre Strategic Site

- 3.20 The North Kensington Sports Centre is located in the north west of the Borough, to the south of the Westway and surrounded by Lancaster Road, Walmer Road and Grenfell Road. The Sports Centre contains various sports facilities, including swimming pools, dance and sports halls, a gymnasium and a café. The site also contains some non-functional open space, car parking and playing pitches. The Council has already agreed the need for a new secondary school in the north of the Borough and Central Government has agreed that this would be in the form of an academy. However, the Council is yet to decide whether the existing sports centre is to be refurbished in-situ or relocated elsewhere on the site.
- 3.21 During the consultation on the North Kensington Area Action Plan respondents generally preferred the option for the redevelopment of the sports centre, highlighting the need for the re-provision of existing facilities, especially swimming facilities. Respondents recognised that the site is underused and could potentially accommodate a school and sports facilities. There was generally little support for the option of relocating the sports centre to another location, so this option was not taken forward. There was wide ranging support for the indicative policy direction at the 'Towards Preferred Options' stage for a masterplan / feasibility study to be undertaken to identify opportunities for the area, which the London Borough of Hammersmith and Fulham (LBHF) considered should be linked with proposals in the White City Opportunity Area.
- 3.22 The Strategic Sites consultation document (May 2009) allocated the site for a minimum of 60 units; a new secondary school (for 1,600 pupils with a site area of no less than 6,000m²) with sports facilities; re-provision of the existing sports facilities, including swimming facilities; a site layout that adds to the legibility and permeability of the street network in the area; and a number of s106 requirements. This consultation raised significant concern with any loss of the existing sports facilities, especially the loss of the swimming facilities; the impact of a new school and a new road layout on existing residential amenity; and clarification regarding the potential loss of open space.
- 3.23 The allocation was generally taken forward in the Draft Core Strategy, although there were some amendments, namely: the proposals for the sports centre were clarified to specifically require the provision of a swimming pool; the provision of external recreation facilities was made clear; the incidental provision of open space was provided as was the provision of a Combined Cooling, Heat and Power system. The figure

for a quantum of housing was removed as this will very much depend on the detailed planning of the site and how much capacity may be available. The final Regulation 25 consultation on the Draft Core Strategy (July to September 2009) found that the provision of a new secondary school in this location was generally well supported, although several respondents reiterated requirements for the sports centre to provide the same facilities as existing, including the provision of existing swimming facilities. Several respondents raised detailed comments, including clarification of the funding and phasing arrangements and measures to improve the wider amenity of the area, such as CCTV, which will be considered as part of an SPD for the Sports Centre site and AAP for Latimer. The allocation was generally taken forward in the Publication Core Strategy, although the secondary school is now an academy; the numbers of pupils envisaged has now been removed, instead floorspace is relied upon; and the provision of open space has also been clarified. The allocation for enabling residential was also moved from the allocation to the funding arrangements.

- 3.24 Aim 1 (Achieving Potential) of the Community Strategy seeks to expand the number of secondary school places in the north of the borough. Aim 4 (Cultural, Arts and Leisure) seeks to improve the quality and accessibility of sports and leisure provision for all in the borough and encourage participation in physical activities and on this basis the proposal is considered to further the aims of the Community Strategy.
- 3.25 There is no one Planning Policy Guidance (PPG) or Planning Policy Statement (PPS) which would apply to the provision of a new academy and proposals for the leisure centre. However, the proposals will need to accord with PPG17 'Planning for Open Space, Sport and Recreation'; PPS25 'Development and Flood risk'; PPS22 'Renewable Energy'; and the supplement to PPS1: 'Planning for Climate Change'. London Plan Policy 3A.18 requires Development Plan Documents (DPDs) to take account of the protection and enhancement of social infrastructure and community facilities, which includes the protection and provision of schools and sports facilities. London Plan Policy 3A.24 requires DPDs to reflect the demand for pre-school, school and community learning facilities and the Plan provides a criterion based approach to the provision of education facilities.
- 3.26 The Sustainability Appraisal (SA) requires the remodelling and/or new development to incorporate the principles of sustainable design and construction, which is considered in the 'Respecting Environmental Limits' policy, and the level of land contamination needs to be assessed, which is addressed in paragraph 23.2.6 of the Publication Core Strategy.

The former Commonwealth Institute Strategic Site

- 3.27 Although a relatively small site, the Commonwealth Institute has been allocated as a Strategic Site given the potential it has in assisting achieving the vision for the Kensington High Street ‘Place’.
- 3.28 The proposed allocation includes 9,300 sq m of exhibition and leisure floorspace (the re-use of the Commonwealth Institute as a high trip-generating public institutional use). There are no alternative options to this proposal as the Council considers that a public institutional use is essential on this site. To assist this aim the Council recognises that some “enabling” development” may be appropriate. This is set out in more detail in the recently adopted Supplementary Planning Document (SPD).
- 3.29 Few representations were received on this site and those that were received indicated general support for use of site as an exhibition use. Representations were received from the owners of the site who were concerned that the allocation was overly inflexible.
- 3.30 The culture, arts and leisure section of the Community Strategy supports the provision of a cultural use, with Aim 2 noting that the Kensington and Chelsea Partnership (KCP) will develop excellence in artistic practice. Part (i) seeks to promote the Royal Borough as home to a thriving artistic and cultural community, with (iv) supporting “developing a range of spaces suitable for use by artists and cultural organisations to create, develop, rehearse or sell their work”.
- 3.31 In terms of the Council’s Sustainability Appraisal, the proposed allocation is considered to have a positive impact upon both the social and economic sustainability objectives. However, the appraisal does flag up that there is a degree of uncertainty relating to the impact upon traffic generation in the area. The Council is, however, satisfied that the impact on will be minimal given the sites location in a highly accessible area, within a Major town centre.
- 3.32 The Council is satisfied that the chosen allocation maximises the potential of the site, utilising a unique building in a way which will greatly strengthen the draw of the Kensington High Street town centre.

Warwick Road Strategic Sites

- 3.33 The Warwick Road was included as a strategic site as part of the strategic sites consultation (May-June 2009) because the combined sites will meet a significant proportion of the housing target in the Borough, creating a high quality residential environment with an opportunity for a coordinated sustainable development and related

infrastructure. Furthermore, the area experiences high levels of housing deprivation as stated in the SA and therefore measures to increase housing delivery in this area are welcomed.

- 3.34 The response to the May/June 2009 consultation denoted general support for the sites allocations. Suggestions for improvements dealt with section 106 contributions (including pedestrian and cycle improvements, open space and community facilities and the inclusion of policing floor space). These infrastructure needs were recognised and were included in the final Regulation 25 consultation for the Draft Core Strategy (July – September 2009). Responses received as a result of the July - September 2009 requested changes on the site allocation for 100 West Cromwell Road and this was for a marginal increase in the number of dwellings and additional floorspace for leisure, social and community uses, car parking and open amenity space and the inclusion of Class C2 in the allocation. The capacity of the site was considered sufficient for these suggested changes to be incorporated in the final allocation. Reference to flood risk was included in the site as a result of comments from the Environment Agency.
- 3.35 The allocation for the sites and the developments that have already been granted planning permission will help achieve many of the aims of the Sustainable Community Strategy such us improving the quality of housing across all tenures; increasing the type and number of homes to build mixed, balanced and sustainable communities; improving the relevance and accessibility of local services to residents and other service users; supporting and developing community life and leadership; creating and maintaining an attractive and vibrant business environment; and improving the quality and accessibility for all with regard to access to public open space within the Royal Borough.
- 3.36 This site will deliver housing in line with PPS3.
- 3.37 The proposed developments should cumulatively deliver a variety of retail, leisure, community and business use facilities which should aid in supporting and developing the local economic base. Moreover, the delivery of the development at the Warwick Road sites will have positive effects on the SA Objectives on equalities, community facilities, housing, parks and open spaces and previously developed land. The sustainability appraisal (SA) also showed that the consideration of community safety on the design of the development and on the infrastructure and planning obligation should help reduce crime and anti-social behaviour.

Earl's Court Strategic Site

- 3.38 This strategic site is important due to its size, its potential pan-London function and the fact that it is linked to other sites located in the London Borough of Hammersmith and Fulham which collectively provide a

major strategic site with potential for a comprehensive mixed-use scheme which could include a vibrant world class residential quarter.

- 3.39 The Earl's Court Exhibition Centre site was originally dealt with at the 'Interim Issues and Options' stage of the Draft Core Strategy where options were explored for the site to either become the host for an International Convention Centre ('London's Convention Centre') as a stand alone development, or alternatively as part of a wider mixed-use proposal, or for be redeveloped as a mixed-use proposal without the convention centre but including offices, housing and a small element of retail. From there, the options were refined in the 'Towards Preferred Options' stage of the Core Strategy to office-led mixed-use development, residential-led mixed-use development and a convention/exhibition centre.
- 3.40 As a result of the comments received from the consultation and the results of the sustainability appraisal, the alternative chosen was a mixture of the three alternatives listed above: a mixed-use development which will include residential and employment uses. A comprehensive scheme for the wider site could provide a sustainable mixed use development with the potential for a vibrant new community, new housing, and the economies of scale needed to support and attract public facilities such as a Convention Centre and leisure and/or cultural uses. Other issues covered in the responses received such as the need to make greater reference to the Hammersmith and Fulham part of the site, and the proposed Opportunity Area designation covering the wider site (including the portion within Hammersmith and Fulham) within the Consultation Draft London Plan, were also included in the final draft of the strategic sites text.
- 3.41 Responses received as a result of the final Regulation 25 consultation (July-September 2009) reflected the need to refer to a more flexible mixed-use allocation on the site which was agreed. A stronger reference to energy infrastructure for the whole of the framework area was also included to reflect comments from GLA. Reference to the sequential and exception tests was included in the site as a result of comments from the Environment Agency.
- 3.42 This site has the potential to assist in achieving some of the aims of the Sustainable Community Strategy, such us improving local transport management, services and networks; improving the quality and access to local health and social care services; improving the quality of housing across all tenures; increasing the type and number of homes to build mixed, balanced and sustainable communities; improving the relevance and accessibility of local services to residents and other service users; supporting and developing community life and leadership; creating and maintaining an attractive and vibrant business environment and improving the quantity and accessibility to public open space within the Royal Borough.

- 3.43 This site will deliver housing in line with PPS3. A joint Supplementary Planning Document (SPD) will be produced working in partnership with the London Borough of Hammersmith and Fulham.
- 3.44 The sustainability appraisal showed that the environmental, economic and social impacts of this site are likely to be positive. The proposed development should help support the local economy, in particular if the potential for office space provision is realised. However, flood risk should be seen as a constraint, and there is scope for further open space and the enhancement of biodiversity, all of which were included in the final draft in the Publication Core Strategy together with the need for community safety in the design of the development.

Lots Road Power Station Strategic Site

- 3.45 The policy direction for the former Lots Road Power Station Site was first consulted on at the 'Towards Preferred Options' stage of the Core Strategy and this included a high quality, high density residential mixed use development, containing a significant element of business use in view of the location of the site within the Lots Road Employment Zone. To achieve the aim of a mixed and balanced community, a significant element of affordable housing was included together with the inclusion of a significant retail element to assist in meeting the day-to-day shopping needs of residents in this part of the borough with a local concentration of social and community uses to serve the local community. Respondents raised concerns regarding the development which was granted planning permission on appeal by the Secretary of State in 2006. In view of the fact that the developers wished to implement their planning permission granted in 2006 the site was not given an allocation and included in the final Regulation 25 consultation of the Draft Core Strategy (July- September 2009). However, in view of the fact that it makes a significant contribution to achieving the aims of the Core Strategy vision it has been included in Publication Core Strategy for information purposes with details of the extant planning permission, which is currently being implemented.

4.0 POLICIES AND ACTIONS

Keeping Life Local

Policy CK 1: Social and Community Uses

- 4.1 The roles of social and community uses are vital to the social cohesion of Kensington and Chelsea and they form the crux of the 'Keeping Life Local' chapter. The policies have considerable support from stakeholders who support the Council's strategic objective to protect and enhance social and community uses.

- 4.2 The option of protecting and enhancing community facilities has been largely in existence since the very first stage of the Core Strategy development. Only minor changes have been made at the request of key stakeholders. One such request was for flexibility with regard to affordable housing requirements as part of the s.106 process in favour of a higher proportion of social and community contributions. This approach, whilst receiving support from some quarters, was questioned by both GOL and the GLA as being not in line with the adopted London Plan policy. In view of these comments the policy has subsequently been altered so as to remove reference to affordable housing.
- 4.3 Northacre objected in the final Regulation 25 consultation (July - September 2009), with particular the reference to Vicarage Gate care home and the protection of elderly person's housing classified as a social and community use in the Draft Core Strategy. However, following legal advice, the Council maintains that elderly persons care homes can be classified as social and community facilities and on this basis this classification has remained in the Publication Core Strategy.
- 4.4 Within the Community Strategy, Aim 3 (v) of the "Environment and Transport" section states that the Kensington and Chelsea Partnership (KCP) hopes to improve local transport by, "ensuring that recreational, educational, health and shopping centres are easily accessible by public transport." Similarly Aim 4 of "Health and Social Care" seeks to ensure that health services are equally provided to the whole population.
- 4.5 Paragraph 36 of PPS3 (Housing) also supports the objective of creating mixed and sustainable communities, the Government's policy is to ensure that housing is developed in suitable locations which offer a range of community facilities and with good access to jobs, key services and infrastructure.
- 4.6 Furthermore, the SA notes that "diverse local centres should be encouraged as they cater for the needs of local people". This is also in line with London Plan Policy 3A.18 which states that the "net loss of such facilities must be resisted and increased provision sought".

Policy CK 2: Local Shopping Facilities

- 4.7 The establishment of a walking time to local shopping facilities is in line with the approach to 'Walkable Neighbourhoods' which have received considerable support from stakeholders. In relation to local shopping, a 5-minute (or 400m distance) is considered more appropriate for the densely built up nature of the Borough than the 10-minute (800m) walk advocated in the "Manual for Streets" published by the Department of Transport. The compact size of the Borough together with the large number of neighbourhood shopping centres means that the majority of residents are already within a 10 minute walk so a more rigorous target

has been adopted. The targets themselves have been relocated from the being embodied in the policy itself, to the monitoring section of the Core Strategy as it is considered that they are monitoring indicators to the success of the policies themselves.

- 4.8 The protection of primary local shopping function of neighbourhood shopping centres has been favoured throughout the Core Strategy process. Flexibility has been built in to allow for certain non retail uses to be developed in centres, namely social and community uses.
- 4.9 The Community Strategy does not consider the detailed location of local facilities. However, Aim 3 (v) of the Environment and Transport section of the strategy is once again relevant here, stating that the Kensington and Chelsea Partnership (KCP) wishes to improve local transport by "ensuring that recreational, educational, health and shopping centres are easily accessible by public transport."
- 4.10 Overall, the policy performed well against each of the environmental, social and economic SA objectives. Impacts are predominantly positive including some significant benefits identified, particularly those objectives which have a climate change, social/community and economy focus.
- 4.11 Planning Policy Statement 6 (PPS6) advocates a "town centre first" approach to the borough's town centres with paragraph 2.4 stating that "wherever possible" the range of "town centre uses" should be concentrated within existing centres. Paragraph 1.8 sets out the town centre uses considered within the PPS - uses which include a range of local facilities, including retail.

Policy CK 3: Walkable Neighbourhoods and Neighbourhood Facilities

- 4.12 The proposal for the establishment of 'walkable neighbourhoods' first appeared at the 'Interim Issues and Options' stage of the Core Strategy. In this, the notion of a ten minute walk was first mooted and roundly supported. This concept has been widely received as a positive approach and one that adds spatiality to the plan.
- 4.13 The Community Strategy does not consider the detailed requirements for walkability. However, Aim 4 of 'Health and Social Care' seeks to ensure that health services are provided equally to the whole population.
- 4.14 London Plan policy 3A.24 makes reference to education facilities being within "safe and convenient access by pedestrians, cyclists and public transport users". To this end, the concept of a 'walkable neighbourhood' is viewed as being a positive move towards stimulating local life. This was also endorsed by the Council's Sustainability

Appraisal and by the Community Strategy. Further to this, London Plan Policy 3A.21 states that the preferred locations for health facilities should be accessible by public transport. Whilst this broader definition of health facilities includes uses not identified as “Neighbourhood Uses”, it should be noted that the Core Strategy states that the General Practitioners should be within a 10 minute walk. This is in keeping with ‘Manual for Streets’ and the NHS Kensington and Chelsea Primary Health Care Strategy which both favour the 10 minute walk. However, the targets themselves have been relocated from the policy wording to the section focussed on monitoring indicators in the Core Strategy.

- 4.15 Support for the promotion of ‘walkable neighbourhoods’ has been substantial and its inclusion within the Publication Core Strategy not only makes the document more spatial, but provides a realistic framework for stimulating local life within Central London which can be easily monitored.

Fostering Vitality

Policy CF1: Location of New Shop Uses

- 4.16 This policy is central to the Council’s ambition to ensure that the town centres within the Borough remain vital and vibrant places, providing for the shopping needs of those who live or work within the borough, and those who choose to visit it. Vibrant centres play a vital role to the Borough’s economy as well as London as a whole, and will contribute to the Core Strategy vision, to further develop a strong and varied sense of place of the Borough.
- 4.17 Given the close proximity of the higher order centres within the borough, and the recognised scarcity of development sites suitable for new town centre uses, the policy does not promote a cascade approach whereby a development will only be permitted within a district centre where there is no suitable site in a major or international centre. Town centre uses will be acceptable in any of the higher order centres as long it is of a nature that will support the vision for that centre.
- 4.18 The centres named as being suitable for new town centre uses all lie within the south of the Borough. This is the part of the Borough that has been identified within the Council’s recent retail needs assessment (published 2008) as being that which is likely to have a “retail need” to 2015 which cannot be accommodated within the existing centres. The retail needs assessment suggests that some 25,000 sq m (gross of additional) comparison floorspace is needed – although much of this floorspace could be accommodated within existing centres be this by the reuse of existing units (which could account for some 10,000 sq. m. (Gross)), or by the increased intensification of development within centres.) It was considered that any estimates on retail need by

centre would be untenable, given the close proximity of the centres, many of which lie a few 100 yards from their neighbour.

- 4.19 Knightsbridge, King's Road, Fulham Road, and South Kensington were all identified as centres which may be suitable for limited expansion as these are all centres which are likely to have some capacity for expansion – each having vacant or under used sites which may be redeveloped in the lifetime of the Plan. The Council does recognise that expansion sites are extremely limited – something that is recognised by the GLA with their current review of the “Town Centre Network” being carried out as part of the work for the new London Plan.
- 4.20 The Council has also identified the Kensal and Latimer areas as parts of the borough which are deficient in local shopping facilities (even more so if the planned development in these areas were to go ahead), and therefore requires the establishment of new centres in these areas to address this deficiency.
- 4.21 There are no alternatives to the directing of new large scale retail development to existing higher order town centres, as this a close reflection of the “town centre first” approach to new town centre uses central to PPS6 and to the London Plan.
- 4.22 Whilst the Council has not offered any other options which question the “town centre first” approach, as any approach would be contrary to this higher level guidance, the Council considered a number of options within this overarching principal:
 - Should the Council use the Mayor of London’s hierarchy of town centres?
 - Should the Council support town centres as containing a mix of town centre uses, whilst remaining a strong core of retail uses?
 - Were the centres in the south of the Borough identified as being suitable for expansion (within the town centre first principle) correct?
 - Is the Council correct in requiring new centres in the Latimer and Kensal areas?
- 4.23 The Council’s approach has been supported by a number of the key stakeholders at the various consultations of the evolving document, not least by the GLA, GOL and by one of our key amenity groups the Chelsea Society. There was little opposition to using the Mayor’s Hierarchy of centres, or to promoting the centres as ‘town centres’ rather than just shopping centres. Similarly there was overwhelming support for the Council’s decision to adopt the Mayor’s Hierarchy and designate both Portobello Road and Westbourne Grove as “Special District Centres” to reflect their specialist nature.
- 4.24 There were no objections to the principal of extending the named centres, as long as any expansion followed the requirements of PPS6

(and as long as impact on residential amenity was also considered). No other sites were put forward at any stage of the evolution of the Core Strategy. Similarly the public have indicated widespread support for the creation of a new neighbourhood centres in the Kensal and Latimer areas (where associated with redevelopment of the area) and where this will assist in meeting a local need – be this retail, or local social and community uses.

- 4.25 The Council has mapped local need services and shown that there is a deficiency in these areas. The creation of a new local centre which meets a local need, which addresses a local deficiency on shopping, or which aids the regeneration of an area is supported by PPS6 as long as existing centres are not harmed. This notion is supported by both the Government Office for London (GOL) and the GLA, neither of whom have raised an objection to the Council's approach. The Council has recognised that the nature of development in both areas will be influenced by the 'need' of the area and the scale of the new retail facilities will be appropriate to this 'need'.
- 4.26 The Community Strategy does not specifically consider new town centre uses. However, the policy approach set out complies with the central goals within the document. For example, the Community Strategy states that the content of this policy and others will help ensure that the borough's centres will flourish and an explicit link supports the first aim of the 'Work and Business section', namely to 'create and maintain an attractive business environment'.
- 4.27 PPS6 is relevant. The Council's position largely adopts the various tests set out in the document. The PPS6 definition of an edge of centre site is not, however, considered appropriate, for at 300m this would encompass nearly all of the Borough. The Council therefore considers edge of centre development to be that adjacent to an existing centre. The sites identified as those which may be suitable for large scale retail expansion therefore all lie adjacent to existing centres.
- 4.28 The Council's SA notes that the Council's town centre policies generally perform well, even against the environmentally focussed SA objectives, given the strong development focus of these policies. This stems principally from the focus of development to existing higher order centres which are likely to be easily accessible by public transport. The policy is also considered to promote the social SA objective of equalities through leisure and recreation opportunities for residents and associated community well-being, thus also scoring well against the community facilities objective. However, an uncertainty exists as to whether the SA objective to provide 'accessible healthcare' would be negatively impacted upon by a focus on retail facilities in policies which include the 'Location of New Shop Uses' and 'Retail Development within Town Centres'. The Council considers that the position taken will not have a negative impact on health care – indeed the support for social and community facilities and the 'walkable neighbourhood' within

the Keeping Life Local section will enhance health care within the borough. This view is endorsed within the SA.

Policy CF2: Retail Development within town centres

- 4.29 The Council recognises that a healthy and vibrant town centre is more than just about concentrations of shops. It is about the nature of these shops, the character of the uses within the centres, and their diversity. It is also about the scale of new development within a centre being of a scale appropriate to the centre (and its place within the hierarchy).
- 4.30 The Council has not offered any alternatives to the over-arching principle of promoting vital and viable town centres and ensuring that the diversity of the centres is maintained. This is an aspiration shared by all.
- 4.31 However, the Council has offered a number of tools to help achieve this diversity. These have developed as a result of the Council's Retail Commission, a body set up to investigate just this issue - how to maintain diversity within the Borough's centres.
- 4.32 In particular the following options were put forward:
 - Require a range of shop sizes to be provided in new major retail development
 - Resist amalgamation of units where possible
 - Require provision of affordable shop units
 - Extend centres beyond that "needed" to increase supply of units and therefore reduce rents, thereby proving more affordable premises suitable for small scale independent retailers.
- 4.33 There has been overwhelming support for the initiatives to maintain or improve the diversity of the Borough's town centres. It has been this topic over all others that has generated the most public interest.
- 4.34 However, many consultees have failed to recognise that the Council has only limited powers and cannot require shops to be of a particular type. This has been a source of frustration for many consultees.
- 4.35 At the 'Interim Issues and Options' stage of the Core Strategy we asked whether we should allow retail uses to establish beyond the existing centres, thereby increasing the supply of shops and reducing rents. This approach was not endorsed by the GLA, by other key stakeholders, or by our own Retail Needs Assessment, and therefore was rejected by the Council, as likely to be both contrary to regional and national policy and counter productive.
- 4.36 The provision of affordable shops, and a requirement of that major retail developments provide a range of unit sizes have received support from the majority of the public, but has been opposed by a number of major land owners, who are concerned that these requirements would

be unreasonable and unworkable and may harm rather than assist in the provision of healthy centres.

- 4.37 The ‘Work and Business’ section of the Community Strategy does not specifically consider new town centre uses. However, the policy approach set out does comply with the central goals within the document. For example, the Community Strategy states that this policy and others which will help ensure that the Borough’s centres will flourish and an explicit link supports the first aim of the ‘Work and Business section’, namely to “create and maintain an attractive business environment”. Specifically the policies support (criteria i) of this aim which is to “seek to offer a range of business, offices and retail premises to suitable different budgets and different needs.” Furthermore the Community Strategy contains a section which specifically recognises that maintaining diverse centres supports this aim.
- 4.38 The importance of the creation/ and or maintenance of diverse town centres has been endorsed by evolving Government Guidance, notably the draft of PPS6 (both the document itself and the accompanying ministerial forward). Similarly the draft PPS explicitly recognises the important role that small shops have to play in ensuring the vitality of town centres. The Consultation Draft Replacement London plan (Policy 2.15 Town Centres) supports initiatives which enhance the quality and diversity of town centre uses.
- 4.39 In terms of sustainability appraisal, the policy is considered to promote the social SA objective of equalities through leisure and recreational opportunities for residents and associated community well-being, thus also scoring well against the community facilities objective. However, an uncertainty exists as to whether the SA objective to provide accessible healthcare would be negatively impacted by a focus on retail facilities in policies including ‘Location of New Shop Uses’ and ‘Retail Development within Town Centres’ policies. The Council considers that the position taken will not have a negative impact on health care – indeed the support for social and community facilities and the ‘walkable neighbourhood’ concept within the ‘Keeping Life Local section’ will enhance health care within the borough. This view is endorsed within the Sustainability Appraisal.
- 4.40 Therefore, the policy chosen is considered to contain the elements which are necessary to will help maintain the diversity of the Borough’s centres, it is supported by Government guidance, has received considerable support from the majority of stakeholders, and by the Sustainability Appraisal. The concerns that the provision of affordable units will harm the vitality of town centres are considered to be unfounded. This is considered to be one of a few methods whereby a Local Planning Authority can have a direct impact upon the nature of the shops within a centre. Clearly, each case will be considered on its own merits, and affordable shops would not be sought where an

applicant could successfully show that they would be inappropriate. The initial alternative which was to expand centres to provide cheaper properties suitable for smaller independent retailers, have been rejected.

Policy CF3: Diversity of Uses within Town Centres

- 4.41 The Council aims to secure the success and vitality of its town centres by protecting, enhancing and promoting a diverse range of shops, supported, but not dominated by, a range of complementary town centre uses. This policy is concerned with setting the appropriate mix of retail/non retail uses within the primary and secondary areas within the town centres.
- 4.42 The Council has offered alternatives for two interrelated aspects of town centre uses. Firstly, should the Borough's centres be encouraged to contain a mix of town centre uses needed by residents and visitors (whilst maintaining the main shopping function), or should non shopping uses be discouraged?
- 4.43 Secondly, what should the actual mix of shop/non-shop uses be? Should the Council:
- Resist the loss of all shops within the primary shopping areas, but allow a higher proportion of non-shop town centre uses in the secondary shopping frontages
 - Allow the loss of some shops in primary shopping areas, as long as certain criteria are met, and allow a higher proportion of non-shop town centre uses in the secondary shopping frontages
- 4.44 Despite only limited public interest the Council has decided to promote town centres as town centres, rather than simple shopping centres. This complies with PPS6 and the London Plan, and therefore with the absence of any widespread objection from residents this was considered to be the most appropriate approach. It supports the Core Strategy overarching vision of maintaining diversity within the Borough.
- 4.45 Turning to the appropriate mix of use, it has proved difficult to engage the public with regard the appropriate balance of shop to non- shop uses in differing parts of a centre. There has not been much support (from the limited number of those who responded) to the resisting the loss of all shops within town centres. A number of land owners have, however, strongly objected to the Council's initial approach to resist the loss of all shops within primary shopping areas, stating that this approach is too draconian and will harm, rather than help maintain the vitality of the centres.
- 4.46 The 'Work and Business' section of the Community Strategy does not specifically consider new town centre uses. However, the policy approach set out does comply with the central goals within the document. For example the Community Strategy states that this policy

and others which will help ensure that the Borough's centres will flourish and an explicit link supports the first aim of the "Work and Business section", namely to "create and maintain an attractive business environment". Specifically the policies support criteria (i) of this aim in "seeking to offer a range of business, offices and retail premises to suitable different budgets and different needs." Furthermore the Community Strategy contains a section which specifically recognises that maintaining diverse centres supports this aim.

- 4.47 In terms of the sustainability appraisal, the policy is considered to promote the social SA objectives of equalities through promoting the good access to social and community uses as well as retail within the Borough's town centres. It, therefore, scores well against the community facilities objective. The Council considers that the position taken will not have a negative impact on health care – indeed the support for social and community facilities and the 'walkable neighbourhood' concept within the 'Keeping Life Local' chapter of the Core Strategy will enhance health care within the Borough. This view is endorsed within the SA.
- 4.48 PPS6 is relevant. Whilst it does support the designation of primary shopping areas as areas which contain a higher proportion of shop uses, it does not support a blanket ban of additional non shop uses. To the contrary, it endorses a mix of uses in town centres, albeit a mix which does not jeopardise the essential retail function of these centres.
- 4.49 The protection of existing A1 uses in primary areas is supported by the Council's Retail Needs Assessment which concludes that the health of some of our centres are likely to be under considerable pressure from the opening of Westfield London in the London Borough of Hammersmith and Fulham, and therefore that we need robust policies in place that resist the loss of existing A1 uses.
- 4.50 The Council has therefore settled on a policy which supports diversity of uses within town centres; allowing the ingress of some non shop uses in both primary and secondary frontages, whilst maintaining the main retail function of the centres. Greater ingress is allowed in secondary areas, but even in these areas a focus on retail should remain. This is considered to be a reasonable and balanced approach which provides the necessary flexibility but not at the risk of supporting the erosion of the retail function of the Borough's town centres. Allowing some social and community uses at the expense of retail in local centres is also considered to support the 'walkable neighbourhood' concept – whereby residents have easy access to the range of services (retail and otherwise) that they require on a day-to-day basis.
- 4.51 The policy includes two exceptions, both developed as a result of public consultation. The Council will resist the loss of all shops in the

Core Frontage of the Portobello Road Shopping Centre. The Council considers that this is necessary as the success of Portobello Road depends on the high proportion of shops in the core areas. Similarly changes of use to A2 and A4 uses are resisted in Notting Hill Gate as we have taken the view that these particular uses have started to degrade the function of this centre.

Policy CF4: Street Markets

- 4.52 The Council recognises that the Borough's street markets contribute to the character of the centres in which they lie. This is a view articulated by the Council's Retail Commission which looked at methods by which Councils, and others, could contribute to the diversity within centres.
- 4.53 The Council has offered no alternatives to this view.
- 4.54 The nature of the Portobello Road, its character and its vitality, dominated much of the 'Issues and Options' consultation stage of the Core Strategy. A number of concerns were raised, including a strong feeling that the Council needs to do what it can to protect the market, as it is the market which is central to Portobello's character
- 4.55 Those consultees who commented supported the protection of the Borough's street markets, as these are considered to play an important role in contributing to the character of the Borough's centres. The Council were reminded that the provision/protection of storage for market stalls is an essential component of a successful market.
- 4.56 The 'Work and Business' section of the Community Strategy specifically considers markets, with part (ix) of Aim I of the 'Work and Business' section stating that the Kensington and Chelsea Partnership will "ensure the borough's markets remain viable and continue to contribute effectively to the economic viability of the area by retaining the sole trader retail identity and the current diverse pattern of street stall holdings." The protection of markets and storage is considered to directly support this aim.
- 4.57 The Council's approach on markets is supported by the SA, with the protection of markets considered to score positively on the social and economic sustainability objectives.
- 4.58 The Council is therefore satisfied that there are no reasonable alternatives to the position that it has taken on markets,

Policy CF 5: Location of Business Uses

- 4.59 The Council seeks to ensure that there will be a range of business premises within the Borough to allow business to grow and to thrive.

There are three parts to the Council's approach: to consolidate large and medium offices with town centres and areas well served by public transport; to protect the employment zones for a range of small and medium sized business activities which directly support the function and character of the zones, and thirdly to support the small offices and other business uses across the Borough where they will not harm residential amenity.

- 4.60 The Council, however, recognises that there are a number of ways that the office sector can assist in maintaining the diversity of uses within the Borough. Therefore, at the initial 'Issues and Options' stage of the Core Strategy we put forward a number of options for new business use in the borough. Should it be supported in accessible areas? Everywhere? Nowhere? Should we consider small businesses in a different way from large offices? As the policy evolved, the Council considered other options. Should the businesses be promoted above others in some areas?
- 4.61 The majority of consultees supported encouragement of small businesses across the borough, although they were more ambivalent about larger business units. Most respondents were content with the current location of large offices, although opinion was divided as to whether we should be encouraging large offices in town centres and in other highly accessible areas, with some concern that the protection of offices at the expense of housing could jeopardise the regeneration of an area and hinder the Council in meeting its housing targets. A further debate was had concerning the Council's definition of "accessible" and whether this should be PTAL Level 4 or Level 5 on Transport for London's (TfL's) Public Transport Accessibility Level map.
- 4.62 The Council's approach to support small and medium business premises across the borough and to consolidate large units in accessible areas directly equates to the 'Work and Business' theme of the Community Strategy, and will contribute to the Kensington and Chelsea Partnership's (KCP) goal of a "borough which enjoys stable levels of economic growth and employment, with the benefits of increasing prosperity enjoyed across the borough." It is also considered to assist in the achieving of the aims within the chapter, not least (i) of Aim one, the "seeking of...a range of... business premises to suit different budgets and different needs" and (v) where the KCP seek to "retaining existing business units...". Furthermore the Community Strategy contains a section which specifically recognises that "retaining the supply of accommodation for small businesses by resisting the change of use to housing" supports this aim.
- 4.63 The Council approach to business uses reflects that in the London Plan in recognising that that the Borough is not a major office location. The London Plan also provides support for providing a diversity of business units, encouraging boroughs to "seek the provision of a variety of type,

size and cost of office premises to meet the needs of all sectors, including small and medium sized enterprises".

- 4.64 The Council's approach is supported by the Sustainability Appraisal (SA) which concludes that this policy performs particularly strongly against SA objectives 7 (air quality) and 10 (traffic). Consolidating and locating key employment uses in areas of high public transport accessibility could significantly help improve local air quality, reduce traffic and emissions from traffic. By requiring that it is only large scale business uses that are located in town centres the Council is ensuring that employment will not be polarised in certain areas – thereby ensuring that this policy will also help support SA Objective 3 (supporting a diverse and vibrant local economy).
- 4.65 The continued concentration of large scale office developments within town centres and other accessible areas is important as it supports both the continued vitality of the Borough's town centres and ensures that as many people as possible can reach these areas without having to rely on the private car. The provision of employment opportunities in a highly accessible areas is seen to be a central tenet of a sustainable pattern of development.
- 4.66 Furthermore, support for a variety of uses within the borough is central to the Council's vision and has been strongly endorsed by the majority of consultees. Indeed GOL has gone as far as to state that in their view an option we postulated at the initial 'Issues and Options' stage of the Core Strategy, that promoted the Borough as a residential ghetto would be likely to be considered to render the plan unsound. Business premises are considered to a significant element in helping maintain this diversity. They provide opportunities for the borough's residents to work as well as allowing the Borough to play an important contribution to London's wider economy. This approach is not considered to be at odds with the Council's ability to meet housing targets as the Council is satisfied that housing targets can and will be met and this is demonstrated.
- 4.67 Policy CF5, included a specific section concerning the Borough's Employment Zones.
- 4.68 The "release" of existing light industrial land in the Employment Zones was not considered to be a realistic option – given the GLA's classification of the Borough as one which should only experience "limited transfer" of industrial land. However, the Council did recognise that there were a number of options for the nature of development that the Council should be supporting in the Employment Zones. Should all development in Employment Zones be business uses? Should mixed uses be considered where there is no net loss land for business use?
- 4.69 The Council evaluated the two options before deciding that it was appropriate to require all new development within the Employment

Zones to be Business uses or others that support the function of the zones. The Council does not support new large scale office uses or other high value uses within the Employment Zones because we are concerned that the introduction of such uses will change the character of these zones - harming their employment function. Given the relatively small area that these zones cover, and the importance of the employment opportunities that they provide, this concern outweighed the benefits that the introduction of new employment uses may have.

- 4.70 This approach is supported by the representations received from the GLA.
- 4.71 The approach is also considered to help to support SA objective 3, (to support a diverse and vibrant economy,) without any significant impact on either of the environmental or social focussed objectives.
- 4.72 The Council's approach to support Employment Zones and for light industrial uses equates to the 'Work and Business' theme of the Community Strategy, and will contribute to the Kensington and Chelsea Partnership's goal of a "borough which enjoys stable levels of economic growth and employment, with the benefits of increasing prosperity enjoyed across the borough." It is also considered to assist in the achieving of the aims within the chapter, not least (i) of Aim one, the "seeking of...a range of business ... premises to suit different budgets and different needs."

Policy CF 6: Creative and Cultural Businesses

- 4.73 Following the publication of the Council's report 'Understanding the creative and cultural sector in Kensington and Chelsea' in 2008, and discussions with our regeneration team, the Council introduced a policy within the Core Strategy which explicitly reflects the value that the Council places upon the creative and cultural business sector.
- 4.74 The public were asked as part of the final Regulation 25 Draft Core Strategy consultation in the summer of 2009 whether they agreed that the Council should promote and protect the workspaces used by the creative and cultural sector. Very few comments were received, and those that were, were supportive of the Council's approach.
- 4.75 The 'Culture, Arts and Leisure' section of the Community Strategy recognises that the Borough "can be proud of its arts and culture" and that a third of the total workspace in the Borough are used by creative industries. This legacy must be built on, with part (i) of aim 2 (to develop excellence in artistic practice) noting that the Kensington and Chelsea Partnership (KCP) will "promote the Royal Borough as home to a thriving artistic and cultural community", and part (iii) stating that the KCP will "attract new businesses to the Royal Borough". The "making connections" section of the chapter notes that the work and

business section has links “supporting creative industries and independent business across the borough”.

- 4.76 Policy 3B.8 (Creative industries) of the London Plan supports creative industries across the capital, recognising the particular role these can have in supporting London’s economy and in driving regeneration.
- 4.77 The Council’s policies on supporting the creative and cultural industries were not considered to have a potentially negative impact on any of the sustainability objectives, with a positive impact predicted in terms of the borough’s economy.
- 4.78 This policy has been taken forward as is considered to assist in enriching both the economy and cultural life of the Borough. No objections have been received by the public, with the policy being further endorsed by the SA.

Policy CF 7: Arts and Culture Uses

- 4.79 The Council supports world class culture as well as supporting a wealth of more local attractions. These uses are considered to greatly enrich the vitality of the Borough and the quality of life of the Borough’s residents.
- 4.80 Arts and cultural uses will be protected and such uses which are likely to generate large numbers of visitors will be directed to town centres and other highly accessible areas.
- 4.81 The Council has not offered any alternative to the protection of arts and cultural uses given the importance that the Council places upon them, other than giving the public an opportunity to object to the proposed position. The Council does recognise that some arts and cultural uses are better located in town centres and accessible areas. No objections were received to this position with there being widespread support for the protection of the arts and cultural uses.
- 4.82 The culture, arts and leisure section of the Community Strategy supports this position, with Aim 2 noting that the KCP will develop excellence in artistic practice. Part (i) seeks to promote the Royal Borough as home to a thriving artistic and cultural community, with (iv) supporting “developing a range of spaces suitable for use by artists and cultural organisations to create, develop, rehearse or sell their work”. The Community Strategy explicitly states that the LDF policies which support premises for arts and cultural uses support this aim.
- 4.83 The Council’s sustainability appraisal (SA) notes that the Publication Core Strategy policies on arts and cultural uses will have no potentially negative impacts, but will be positive in terms of the economic, social and environmental objectives.

- 4.84 The Council has, however, recognised that there can be a conflict between tourists and residential amenity, with arts and cultural uses being one of the drivers for tourism. The Council considered that there were two broad approaches that could be taken: should the Council simply seek to minimise and contain the impacts of tourism? Or should it develop a strategy to make the most of the benefits that tourism can bring?
- 4.85 The response to the consultation was clear, that the emphasis should be in improving the existing tourist experience rather than increasing tourist numbers. A number of consultees also made the point that improvements to the public realm and associated facilities (for example cafes and small shops) that could support tourists will also benefit local people. The Council supports this approach and the Publication Core Strategy does not promote tourism at all costs. It recognises that rapid expansion of the tourist economy could harm the very thing that attracts the tourists themselves. The Publication Core Strategy does, however, take a positive stance towards tourism, with for example, policies to protect much of the existing hotel stock; to support our town centres (the principle reason that tourists visit the borough) and support the South Kensington Museums complex. Tourism plays a very significant role of both enhancing the borough's economy enhancing its reputation.

Policy CF8: Hotels

- 4.86 The Borough is one of London's principal providers of visitor accommodation. In turn this sector provides approximately 40% of the Borough's jobs. The Core Strategy, therefore, has to steer a path which recognises the role that the Borough's hotels play in the local and wider economy; and to London's role as a world city, whilst at the same time protecting the residential character and amenity of the areas in which they are located.
- 4.87 The Council have asked whether it should let hotels be lost to other uses, or whether it should start protecting hotels, at least until after the 2012 Olympics.
- 4.88 There was little consensus about the desirability to protect hotels. The principal concern relates to ability for the Council to promote the change of use of poor quality hotels, rather than hotels in general as there was concern from some residents and members that a concentration of hotels, particularly poor quality ones, have a detrimental effect on the residential character of certain parts of the Borough. The GLA has however, been more bullish, endorsing an approach to protect hotels across the borough without exception.

- 4.89 The sustainability appraisal recognises that tourism is an important asset to the borough - and that economically "it would seem that encouraging more hotel accommodation and more tourism...were appropriate". However, balance is needed to ensure that a growth in tourism does not harm the borough's character and cultural heritage - the very reason than tourists choose to visit the borough. Some form of continued restraint is therefore supported. The SA also noted that hotel development should be encouraged on previous developed land, and "avoided on green field, open space, ecologically and historically important land."
- 4.90 In addition the location of major trip generators within town centres and other highly accessible areas is seen to be a central tenet of a sustainable pattern of development.
- 4.91 The Community Strategy does not consider the provision of hotels as such. However, the 'Culture, Arts and Leisure' chapter does seek to encourage the active participation in arts and cultural activity, and develop and excellence in artistic practice. This will support the Borough as a tourist destination. Similarly, support for tourism will contribute the KCP's goal within the 'Work and Business' theme, namely of a "borough which enjoys stable levels of economic growth and employment, with the benefits of increasing prosperity enjoyed across the borough."
- 4.92 As a planning authority the Council recognises that it cannot protect or encourage certain types of hotel. All hotels fall within the same use class. However, the protection of hotels until 2012, save from those areas where the Council has shown there is a particular concentration (a concentration which has degraded residential character) allows the Council to ensure that the Borough contributes to the success of the 2012 Olympics and Paralympics, but not at the expense of the Borough's character.

Policy CF 9: The South Kensington Strategic Cultural Area.

- 4.93 The Council recognises that the South Kensington museum complex contains an internationally significant concentration of cultural attractions. The Council, however, also recognises that other concentrations of cultural uses lie within the Borough, for example at the western end of Kensington High Street and in the wider Notting Hill area.
- 4.94 The Council therefore asked, at the 'Interim Issues and Options' stage of the Core Strategy, whether local cultural quarters should be identified. There was very limited interest in the designation of local cultural quarters, and those who did comment were more concerned about the promotion of cultural uses in any of our town centres, rather than specific areas. Despite the lukewarm response the Council does

consider that the designation of a ‘South Kensington Strategic Cultural Area’ is necessary to recognise the area’s outstanding universal value as a visitor destination. The area enriches the capitals cultural life, with over 8.5 million visits being made to the museums complex in 2007.

No objections were made to this approach when consulted upon at the final Regulation 25 Draft Core Strategy consultation in the summer of 2009. No further cultural quarters were designated.

- 4.95 The sustainability appraisal assesses this policy against the 17 SA objectives and does not indicate any negative impacts. Designation is likely to improve local distinctiveness, and amenity through the conservation and enhancement of cultural heritage.
- 4.96 The Community Strategy does not consider the museums complex as such. However, the ‘Culture, Arts and Leisure’ chapter does seek to encourage the active participation in arts and cultural activity, and develop and excellence in artistic practice. Designation of a strategic cultural area is likely to help achieve this aim.
- 4.97 Despite limited public interest, the Council has chosen to designate the South Kensington museum complex as a strategic cultural area given that it lies within the CAZ and does contains an internationally significant concentration of cultural attractions.

Better Travel Choices

Policy CT 1: Improving alternatives to car use

- 4.98 There was some concern from respondents that requiring high trip generating development to be located in areas of PTAL four or higher was too restrictive and that a lower PTAL should be included. The Kensington Society felt that PTAL four was too low and PTAL five was more appropriate. PTAL four is considered a good level of public transport accessibility by TfL and is considered appropriate for higher residential densities in the London Plan. Therefore PTAL four has been retained as an appropriate minimum PTAL for high trip generating development.
- 4.99 Some respondents also felt that reducing maximum levels of car parking and requiring permit-free for all new residential development was too restrictive, and that the text was not clear enough regarding off-street parking standards. The wording to Policy CT1 has been amended and is now clearer as well as providing sufficient flexibility for site specific issues to be considered when development proposals are being assessed. Permit-free is an established policy that responds to the high levels of parking pressure in the Borough. The policy has been retained. Some responses stated that a number of elements were missing from the policy such as detail on coach parking, parking standards, transport assessments, travel plans, cycle parking

standards, access for all and car clubs. A number of these points are considered to be too detailed for inclusion in a Core Strategy or are dealt with elsewhere. This includes coach parking, the detail of parking standards, thresholds and detailed guidance on Travel Plans and Transport Assessments and car clubs. Additional text has been added regarding the need for it to be demonstrated that development will not have unacceptable impacts on traffic congestion, parking demand or public transport capacity as well strong wording on step-free access.

- 4.100 Some respondents felt that there was not sufficient justification for the inclusion of a policy seeking improvements to the Earl's Court One Way System (ECOWS). Reducing the barriers to movement is an integral part of improving walking and cycling and this was raised consistently during public consultations. The Earl's Court One-Way System is both a barrier to movement and a blight on the communities that surround it. Its return to two-way operation would significantly improve the current situation. Work has been undertaken by Colin Buchanans, commissioned by TfL, that demonstrated returning the ECOWS to two-way operation was feasible, although challenging, and requiring a reduction in traffic on the network. Given the significant benefits to the communities surrounding the one-way system the policy has been retained.
- 4.101 This policy option combines a number of different options put forward since the first 'Issues and Options' stage in 2005. The development of this policy has been guided by consultation and national and regional guidance.
- 4.102 Improving alternatives to the public car is fully endorsed by the central goal of the 'Environment and Transport' Chapter of the Community Strategy. Aim 3 is of particular relevance, "to improve local transport management, services and networks, and encourage, and provide for alternative travel opportunities to car use."
- 4.103 The SA is generally supportive of the approach taken by the Council, with the locating high trip generating uses in highly accessible areas seen as central to a sustainable pattern of development. The SA did, however, note that where an area has a PTAL rating lower than 4 but has been prioritised in terms of development needs, the Council must consider how the rating could be increased before relocating development to another area. The Council endorses the improvements to public transport to improve accessibility across the Borough.

Policy CT2: New and enhanced rail infrastructure

- 4.104 There were only two comments related to Policy CT2 in the most recent consultation. The Kensington Society stated that a station and link between the West London Line (WLL) and Earl's Court would be more beneficial than improved interchange from West Brompton

Station. The Council has not assessed the benefits of a new station on the WLL at Earl's Court, however, interchange at this site with the underground may provide more benefit to more people than an improved interchange from West Brompton. The wording of the policy has been amended to reflect a general desire to improve interchange from the West London Line (WLL) to the underground, acknowledging that the redevelopment of the Earl's Court site may provide opportunities for this.

- 4.105 Transport for London (TfL) stated that they do not object to Borough aspirations for new stations but that it should be made clear that their Business Plan or the revision of the Mayor's Transport Strategy does not include reference to a new station on the WLL near North Pole Road. The consultation wording of the policy is to "*promote the creation of a new station on the West London Line at North Pole Road*" and the Corporate and Partner Actions state that the Council will work with TfL to provide new rail infrastructure. The policy does not suggest that a new station is part of TfL's current plans and the chapter states we will work with TfL. Therefore no changes have been made to the policy.
- 4.106 Improving alternatives to the public car is fully endorsed by the central goal of the 'Environment and Transport' Chapter of the Community Strategy. Aim 3 is of particular relevance, "to improve local transport management, services and networks, and encourage, and provide for alternative travel opportunities to car use."
- 4.107 The SA is generally supportive of the approach taken by the Council, with the promotion of public transport (and the subsequent reduction in the use of the private car) being seen as central to a sustainable pattern of development. The SA noted that new stations and public transport will contribute to this aim.

An Engaging Public Realm

Policy CR1: Street Network

- 4.108 The historic street patterns of the Borough have long proved successful in terms of legibility. The continuation of this pattern, along the re-establishment of the traditional street pattern in areas where it has been lost, particularly within post-war developments, has been endorsed by the public and other stakeholders throughout the evolution of the Core Strategy.
- 4.109 Aim 1 of the Community Strategy is "To protect and improve the borough's environment by: ii. continuously seeking to improve the borough's streetscape by undertaking major improvement projects, promoting good design, using high quality materials and workmanship and removing street clutter". The Street Network policy is directly

delivering this aim of the Community Strategy, along with other policies, such 'Streetscape'.

- 4.110 In terms of national and regional guidance, there are several policies which relate to this strategic policy. PPG13 gives priority to pedestrians, cyclists and public transport in town centres, local neighbourhoods and other areas with a mixture of land uses. The London Plan 'Policy 3C.16 Road scheme proposals', aims to reduce congestion and make better use of London's streets and roads.
- 4.111 Improving the street network and streetscape based on the borough's historic patterns with a focus on high quality network of streets, squares and public spaces is compatible with SA Objectives 1, 5, 8, 10 and 16.

Policy CR2: Three-Dimensional Street Form

- 4.112 The Council has always prided itself on its high quality streets, its traditional characteristics of street tree plantings, active street frontages and the relationship between the buildings and streets has long made the borough's street form attractive, safe and functional.
- 4.113 Previous public consultation has focused around the safety and security of the street environment, as much as the aesthetic value of the streets. There was some confusion over what was meant by 'Street Form' and how it differed from 'Street Network' and therefore the policy was renamed 'Three-Dimensional Street Network' to ensure that the street, the buildings forming a frontage to the street and the surrounding spaces were included in the definition.
- 4.114 This strategic policy continues to deliver Aim 1 of the Community Strategy in promoting good design.
- 4.115 The proposed policy delivers the aims of PPS1 (35) which states that "High quality and inclusive design should be the aim of all those involved in the development process. High quality and inclusive design should create well-mixed and integrated developments which avoid segregation and have well-planned public spaces that bring people together and provide opportunities for physical activity and recreation"
- 4.116 The Sustainability Appraisal (SA) states that an improved public realm is likely to be compatible with the crime, equalities and community facilities SA objectives.

Policy CR3: Street and Outdoor Life

- 4.117 The responses from previous consultations highlighted the need for a sensitive approach to the location and careful management of the activities within the public realm. For example, pavement cafés need

wider footways and should be encouraged in busier, commercial locations, where they can add to vitality without upsetting residents. Several respondents commented that the policy was more than just ‘Street Life’, which was the previous title of the policy. The Council agreed with this and therefore renamed the policy ‘Street and Outdoor Life’ to ensure that the policy was all encompassing and did not focus purely on activities that occurred with the street to public highway but also covered other outdoor activities which occurred in places such as parks and other public outdoor areas.

- 4.118 Aim 4 of the Community Strategy is “to improve the quality and accessibility of all public open spaces within the borough by: iii. providing spaces for relaxation, recreation and exercise and making parks feel safe for everyone to enjoy;”. The Council considers that creating ‘Street Life’ actively delivers (iii) of Aim 4.
- 4.119 The ‘Street and Outdoor Life’ policy also helps deliver PPS1 (35) as it ensures that the streets function well and adds to the overall character and quality of the area, not just for the short term but over the lifetime of the development.
- 4.120 The Sustainability Appraisal states that The Street and Outdoor Life policy performs well against the social equalities and economic SA objectives without any evident adverse environmental impacts.

Policy CR4: Streetscape

- 4.121 Street furniture, signs and lamp-posts can not only detract from the visual character of the Borough but can also hinder the safe passage of people with sensory disabilities. The Borough considers visual appearance and the functionality of streets as vitally important to the Borough’s overall high quality character.
- 4.122 The majority of the consultation responses concluded that the policy aim should be to enhance, extend and improve pedestrian environments including signage, street furniture and trees, all in a safe and secure environment, and generally deliver a more attractive street environment to a wider user group. However, it should not be at the expense of moving congestion and pollution elsewhere in the Borough; and we should not squeeze out buses from our streets, as they have a very positive role to play.
- 4.123 This policy is consistent with PPG13 (8), which states: to “give priority to people over ease of traffic movement and plan to provide more road space to pedestrians, cyclists and public transport in town centres, local neighbourhoods and other areas with a mixture of land uses”;
- 4.124 The London Plan Policy 3C.16 specifically states ‘improve safety for all users’ and ‘improve conditions for pedestrians, cyclists, disabled

people, public transport, freight and business'. The Council considers the Core Strategy policy delivers the spatial element of Policy 3C.16.

- 4.125 Improving the street network and streetscape based on the borough's historic patterns with a focus on high quality network of streets, squares and public spaces is compatible with SA Objectives 1, 5, 8, 10 and 16.

Policy CR 5: Parks, Gardens, Open Spaces and Waterways.

- 4.126 The Borough has a strong tradition of high quality parks and gardens, this tradition needs to be continued to ensure that the strategic objectives of 'An Engaging Public Realm' and 'Renewing the Legacy' are delivered.
- 4.127 The majority of written responses felt that all new development should have adequate, accessible, open space, or contributions to its creation. Children's needs and biodiversity were the most popular priority when it came to open spaces. The previous iteration of the policy at the final Regulation 25 consultation did not include policy criteria to improve open space deficiencies. In light of the comments received, the policy was strengthened to include a requirement for major development to provide for open space in deficient areas, or where this was not possible that a financial contribution be made to improve public open space in the Borough. A reference to biodiversity and wildlife habitat was also included in the Publication Core Strategy to ensure that comments received from Natural England were addressed.
- 4.128 This policy also helps deliver the requirements of PPG17: 'Planning for Open space ,Sport and Recreation' which states that well designed and implemented planning policies for open space, sport and recreation are fundamental to delivering broader Government objectives for improving health and well being.
- 4.129 This policy ensures that the spatial aspects of the Draft River Basin Management Plan (Thames Region) and the Local Biodiversity Action Plan 2007-2011 are also delivered.
- 4.130 Specifically, the policy delivers the Sustainability Appraisal Objective 8, which is to 'Protect and enhance the Royal Borough's parks and open spaces' and the Community Strategy AIM 4 'To improve the quality and accessibility of all public open spaces within the borough'.

Policy CR6: Trees and Landscape

- 4.131 The Borough has a long standing reputation for its high number and quality of streets and the high amenity value the existing residential gardens contribute to the public realm. The majority of the representations on this policy were in general support. Comments

received regarding the protection of trees during development was taken into consideration and resulted in additional policy criteria to ensure that this issue was covered.

- 4.132 The Sustainability Appraisal states that the policy performs particularly well against the Environmental SA objectives which focus on providing protection, enhancement and creation of the natural environment.
- 4.133 The Community Strategy ‘Environment and Transport’ Aim 1 is to ‘To protect and improve the borough’s environment by (a) Protecting and enhancing the borough’s residential and historic character, services and amenities, trees, parks and open spaces;’ therefore this policy seeks to deliver this by protecting existing trees and promoting new trees.
- 4.134 This policy also helps deliver the requirements of PPG 17 on Open Spaces and the Borough’s Tree Strategy.

Policy CR7: Servicing

- 4.135 As Kensington and Chelsea is primarily a residential borough, the effects of servicing can have a detrimental affect on residential amenity. On-street parking within the Borough is also very high and therefore any additional demands on the roads due to servicing requirements need to be carefully managed.
- 4.136 Only two responses were received on this policy at the final Regulation 25 ‘Draft Core Strategy’ consultation stage in the summer of 2009. One reference was made to ensuring that existing servicing should be sensitively integrated into the development, however, the Council considered the focus of the policy should be on meeting new servicing demands. The GLA recommended that there should be reference to the London Freight Plan, however, the Council considered that the matter of freight was not of strategic importance to this particular Borough and therefore no changes were made to the policy in light of the comments received.
- 4.137 This policy delivers the spatial aspect of the London Plan ‘Policy 2A.8 Town Centres’, which aims to deliver a polycentric strategy for London’s development by “reducing delivery, servicing and road user conflict”.
- 4.138 The Community Strategy ‘Environment and Transport’ Aim 3 is “To Improve local transport management, service and networks, and encourage and provide for alternative travel opportunities to car-use by: Maintaining streets to a high standard so that walking is easy and safe and cyclists, buses and other vehicles can move safely” Policy CR7 helps to deliver this by ensuring the safe functioning of the road for road users and pedestrians alike.

- 4.139 Sustainability Appraisal Objective 10 is “To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic.” Policy CR7 seeks to ensure that traffic congestion arising from servicing is limited and therefore is consistent with SA Objective 10.

RENEWING THE LEGACY

Policy CL1: Context and character

- 4.140 The Borough has a strong history of high quality building design and this policy is vital in delivering the Strategic Objective of ‘Renewing the Legacy’.
- 4.141 The policy option, in relation to the Borough’s high quality design character, was strongly supported by those who responded throughout the Core Strategy consultations. There were a number of requests to better integrate the issues relating to safety and crime prevention into the policy.
- 4.142 The policies within the ‘Renewing the Legacy’ chapter all provide a spatial distinction in delivering PPS1: with regard to ‘Design’, particularly in relation to (34), which states, “Planning authorities should plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes. Good design should contribute positively to making places better for people. Design which is inappropriate in its context, or which fails to take the opportunities available for improving the character and quality of an area and the way it functions, should not be accepted.”
- 4.143 This Strategic Objective of the SA clearly identifies the importance of the Borough’s quality built and natural environment as a key element to the long-term success of the Borough. The priority to preserve and enhance existing buildings and specify high design quality for new buildings should ensure compatibility with SA Objectives 14 and 16. The creation of new conservation areas should also help protect the natural environment and biodiversity (SA Objective 1) and enhancing the Borough’s parks and open spaces (SA Objective 8).
- 4.144 The Community Strategy ‘Environment and Transport’ Aim 1: “To protect and improve the borough's environment by: (i) Protecting and enhancing the borough's residential and historic character, services and amenities, trees, parks and open spaces” is spatially delivered through Policy CL1 and the other policies contained within the ‘Renewing the Legacy’ chapter.

Policy CL2: New Buildings, Extensions and Modifications to Existing Buildings

- 4.145 The wide variety of architectural styles within relatively small areas in the Borough require a sensitive approach to the architectural design of new buildings, and to extensions and modifications to existing buildings.
- 4.146 Throughout the consultations, conservation and good design principles were of prime concern of respondents. This is especially important within the Royal Borough given that the vast majority of the Borough is designated as Conservation Areas. The issue regarding high buildings has been modified in light of comments as there was a need to provide greater clarity over the criteria for the height of buildings and what was classified at 'high'. The policy was also given sub-headings as a number of respondents suggested that this would also provide greater clarity.
- 4.147 The Community Strategy 'Environment and Transport' aim 1 is "To protect and improve the borough's environment by: iii. maintaining the borough's unique built environment and local heritage by preserving the borough's listed buildings and conservation areas". Therefore it is important that the Core Strategy helps deliver this aim through its planning policies.
- 4.148 This policy helps deliver the London Plan Policy 4B.2: 'Promoting world-class architecture and design'.
- 4.149 The Sustainability Appraisal states that 'A focus on requiring new buildings, extensions and modifications to be of the highest architectural and urban design quality' and sensitive to the existing local context should help contribute to meeting the strategic objective of 'Renewing the Legacy'.

Policy CL3: Historic Environment

- 4.150 Over 70% of the borough is covered by conservation areas which provide the backdrop for the Borough's high quality built environment which is renown locally, nationally and internationally. Not only is preservation but also enhancement of character important to the 'Renewing the Legacy' strategic objective of the Core Strategy.
- 4.151 Responses to the various stages of consultations over the duration of the Core Strategy have generally been supportive and consider that the preservation and enhancement of the Borough's historic environment are a high priority.
- 4.152 There was need for clarity on the policy criteria regarding the demolition and possible collapse of buildings in conservation areas.

- 4.153 This policy highlights to local requirement of PPS 1 (34) which states ‘Design which is inappropriate in its context, or which fails to take the opportunities available for improving the character and quality of an area and the way it functions, should not be accepted.’ The policy ensures that the ‘harm test’ is not enough when it comes to development within the borough with such a high quality character.
- 4.154 This is also echoed in the Community Strategy aim 1: To protect and improve the borough’s environment by: (iii). maintaining the Borough’s unique built environment and local heritage by preserving the borough’s listed buildings and conservation areas; (iv). ensuring that new buildings enhance the townscape.

Policy CL4: Historic Assets

- 4.155 The Borough contains a high number of listed buildings, and with the high demand for change to our listed building stock for a variety of reasons, it is vital that the Core Strategy contains a policy to not only preserve, but also enhance these buildings for future generations to enjoy.
- 4.156 There was general support for this policy and only minor changes were made to the policy from the final Draft Core Strategy version to the Publication version.
- 4.157 Policy CL4 is consistent with the emerging Planning Policy Statement: Historic Environment (PPS15).
- 4.158 The Sustainability Appraisal Objective 16 is ‘To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage.’ The Historic Asset policy is crucial in delivering this objective.
- 4.159 The Community Strategy aim 1: “To protect and improve the borough’s environment by: (iii). maintaining the borough’s unique built environment and local heritage by preserving the borough’s listed buildings and conservation areas”, is spatially delivered by Policy CL4

Policy CL5: Amenity

- 4.160 The Council will require new buildings, extensions and modifications and small scale alterations and additions, to achieve high standards of amenity.
- 4.161 The densely developed nature of the Royal Borough is such that the protection of the levels of amenity enjoyed by users of its existing buildings and spaces, and the design of new development to provide

for equally high levels of amenity, are critical factors to ensuring a good quality of life for all.

- 4.162 A policy relating to ‘Residential Amenity’ was included in the ‘Diversity of Housing’ chapter. Responses from the final Regulation 25 consultation for the ‘Draft Core Strategy’ suggested that the issue of amenity should be considered in the ‘Renewing the Legacy’ chapter and therefore a new policy on ‘Amenity’ was included in the ‘Renewing the Legacy’ chapter for the Publication Core Strategy.
- 4.163 Policy CL5 has a positive impact on Sustainability Appraisal Objective 16. The Sustainability Appraisal suggested that the wording be changed in (a) from “significantly reduced” to “adversely impacted,” however, the Council considered that this would not provide a policy that was enabling.
- 4.164 The Community Strategy Aim 2: “To deliver services and work with local people day to day to make the borough a pleasant place by: ii. Protecting residents from noise and disturbance;” is assisted by Policy CL5 which helps deliver the protection of amenity on a spatial basis..

Policy CL6: Smallscale Alterations and Additions

- 4.165 In view of the nature of the Borough’s built development which is to have a high proportion of buildings in multiple ownership, there is the potential to have a high number of alterations and additions within close proximity to one another. The cumulative effects of smallscale alterations and additions can therefore negatively impact on the borough’s overall townscape and on this basis is considered of strategic importance.
- 4.166 A number of the comments received related to amenity issues resulting from small-scale alterations and therefore as a result an additional policy was included in this chapter relating to amenity. It was also considered that this policy should be re-ordered to illustrate the importance of the ‘Historic Environment and Historic Assets’ in the Borough.
- 4.167 This policy highlights to local requirement of PPS 1 (34) which states ‘Design which is inappropriate in its context, or which fails to take the opportunities available for improving the character and quality of an area and the way it functions, should not be accepted.’ The policy ensures development maintains and enhances the high quality built environment of the Borough.

DIVERSITY OF HOUSING

Policy CH1: Housing Targets

- 4.168 Whilst at the 'Issues and Options' stage of the Core Strategy (2005) referred to various locations that may be suitable for housing, it was not felt that such detailed questions needed to be followed through in subsequent versions of the Core Strategy. Some issues would, however, have been covered in the consultation on other sections of the Core Strategy, such as in 'Fostering Vitality'. The final Regulation 25 consultation of the Draft Core Strategy sets out the limited number of locations not suitable for new housing, including Employment Zones and on the ground floor of town centres.
- 4.169 In relation to the 'Towards Preferred Options' consultation, it was suggested by some respondents that the Council should retain a policy priority in favour of residential development in order to ensure that it is more likely that the housing target will be met, because in recent years housing completions have not been very high. The Publication Core Strategy now refers to both the current housing target of 350 net additional dwellings a year, and the new target of 585 units per year which will come into force once the London Plan is replaced (estimated to be 2011/12). The affordable housing target is also referred to as 200 units per annum from 2011/12 until 2021/22, from all sources.
- 4.170 The Community Strategy (2008) aims to increase the type and number of homes in the borough in order to build mixed, balanced and sustainable communities. The policy is in accordance with this objective.
- 4.171 In the Draft Core Strategy consultation (July - September 2009), there were only a limited number of comments on Policy CH1. The 'Environment Round Table' stated that they did not wish to see a new housing target exceed 350-400 units per annum. GOL stated that it is necessary to outline the implications of higher housing targets in terms of demand for land, services and infrastructure. A number of comments reflected concern that the 85% social rented housing / 15% intermediate housing borough wide target was too onerous. One respondent stated that the wording of part (c) should be made more flexible by removing the word 'require' and inserting more flexible wording in relation to the proportions of intermediate and social rented housing to be sought. A number of commentators felt that the emerging London Plan tenure split should be adopted (60% social rented housing and 40% intermediate housing).
- 4.172 PPS3: Housing (2006) requires local authorities to determine the level of housing provision taking a strategic, evidence-based approach that takes into account relevant local, sub-regional, regional and national policies and strategies through collaboration with stakeholders. The Council has recently been involved in the 2009 Strategic Housing Land Availability Study co-ordinated by the GLA. Once completed, a new borough housing target will be produced. This will be subjected to testing via the forthcoming London Plan Examination in Public. The policy is consistent with this requirement.

4.173 The Sustainability Appraisal for the 'Towards Preferred Options' consultation indicated that a focus on housing delivery raises a degree of uncertainty across the majority of the environmentally focused SA objectives. Significant new development has the potential to place additional pressures on the local environment. However, the building of 'Lifetime Homes' and high quality homes should result in compatibility with the energy efficient SA objectives. There was no comment on this policy in the Sustainability Appraisal of the Publication Core Strategy.

Policy CH2: Housing Diversity

4.174 The policy includes a number of different components including housing mix, wheelchair accessible housing, lifetime homes, older person's housing, affordable housing and gypsy and travellers.

Housing Mix

4.175 The housing mix part of the policy requires developments to provide a mix of different types, tenures and sizes of units. In terms of mix, the most support (i.e. 30%) in the 2005 public consultation, was for seeking a range of house and flat types, which is the approach that has been taken forward. However, the Council is aware, from the evidence, of the strong demand for larger units in both the market and affordable housing sectors. Therefore, on the suitable sites, larger units may be sought whereas on other sites it may be more appropriate to seek smaller units. The Council has taken forward a flexible approach to take account of individual site characteristics. Therefore the options to seek only larger units, and leave it to the market have not been taken forward. In addition, the option to only apply a mix to schemes with 10 or more units was rejected because it is regarded as beneficial to provide a mix of different sizes of units in all schemes. In the July - September 2009 final Regulation 25 consultation The Kensington Society objected to the recommended housing mixes set out in the evidence section - particularly the emphasis on larger market units.

4.176 The policy also refers to homes being built to 'Lifetime Home' standards and wheelchair accessibility standards. There was a small and mixed consultation response on this issue, although there was support from the GLA and the Kensington Society re. 'Lifetime Homes'. In the July 2009 consultation there were no significant comments on 'Lifetime Homes / Wheelchair Accessible' homes.

4.177 The housing mix aspect of the policy is consistent with PPS3 paragraphs. 20-24 and the London Plan Policy 3A.5.

4.178 The proposals for older person's housing are also consistent with PPS3 and the London Plan. Consultation comments generally supported protection of existing facilities, although some respondents argued that need and demand for the retention of a facility should be

shown. There was general support for the provision of new types of housing, such as 'extra care' schemes. In the final Regulation 25 (July - September 2009) Draft Core Strategy consultation one respondent requested a reference to protecting homes where there is an 'identified need'.

- 4.179 There was a very mixed response at the 'Towards Preferred Options' consultation stage to the proposals to allow de-conversions/amalgamation of units. Some people supported this without restriction, others felt it should only be allowed if the building is then converted to affordable housing, and others opposed it completely due to the net loss of homes. The Council is of the view that amalgamation of units – which frequently involves a property originally built as a single house reverting to such a use, is beneficial because it often creates more family housing and reduces parking pressure. Any loss of units should be compensated for by new housing developments so that there is no net loss of housing in the Borough.
- 4.180 The final Regulation 25 (July- September 2009) consultation policy to require that planning permission would be required for proposals involving the amalgamation of six units into a smaller number of units, or into a single home generated a mixed response. Some respondents felt this policy should not be taken forward ('Environment Round Table'), whilst others felt there was not enough clarity regarding the current wording. For example, how would an application for 5 units into a single house be treated? However, the question of planning permission is for primary legislation and not one for the Core Strategy and the key question was therefore how many units would we allow to be lost through conversion? We considered that schemes that involved the loss of 5 units or more would resisted so that a suitable balance could be struck between the creation of larger single family units and the loss of smaller units.
- 4.181 In the July - September 2009 consultation there was some criticism of the intention to seek 85% social rented housing and 15% intermediate housing - it was argued this split did not conform with the London Plan. Some developers objected to the requirement to make an application for affordable housing concurrently with the main application. It was argued that there are adequate safeguards in legal agreements to ensure the timing of the affordable housing scheme, and this policy requirement was not necessary.
- 4.182 A question on HMOs was initially raised in the 2005 consultation but then was not considered again until the final Draft Core Strategy consultation, (July - September 2009). This is because the Council was of the view that it was too detailed a subject for the Core Strategy and would be addressed in a separate development management policies DPD. However, due to member interest in this topic it has been revisited and was included in the July - September 2009 Draft Core Strategy consultation. In the 2005 consultation there were mixed views

on this issue with roughly the same numbers of respondents supporting the protection of HMOs, or protection in some situations compared to those concerned with good living standards who felt they should be converted into self contained units. There were no significant comment on this issue in the July 2009 consultation. However, it is considered that a reasonable balance has been struck between the loss of HMOs which are at the lower end of the private rented market and the need to provide a good standard of residential accommodation by allowing them to be converted to studio flats which are then protected by a S106 agreement.

- 4.183 New Amenity space: A number of respondents stated that a requirement for amenity space to be provided for all new housing was too onerous and not practical because some sites, such as town centre sites, may not provide any opportunities for amenity space. One respondent commented on the need for a design-led approach to the provision of amenity space, rather than one based on area based standards for amenity space. This respondent also noted that regard should be had to the substantial areas of parks in the borough and proximity to these when judging if private outdoor space is essential for a particular scheme. There were mixed views on roof gardens with some respondents supporting them without restrictions and others concerned that the policy did not include sufficient conditions to prevent/militate against roof terraces and balconies which may create noise or overlooking. There were also internal concerns that the reference to smaller sized accommodation in relation to roof gardens was too limiting.
- 4.184 The consultation comments indicated there was general public support for the provision of amenity space and for a flexible, rather than overly prescriptive policy to take into account the different site circumstances. For this reason, the Council encourages provision of a range of different types of external amenity space, and stresses the importance of outdoor amenity space for family housing in particular. This is consistent with paragraph 17 of PPS3.
- 4.185 The Sustainability Appraisal (SA) did not consider that this policy had any potentially negative aspects.

Affordable Housing

- 4.186 The affordable housing policy has evolved to reflect the relatively unique circumstances in the Borough. A floorspace threshold equivalent to the London Plan ten unit trigger for affordable housing, has been developed in order to take account of the many applications for less than 10 large luxury flats which would otherwise not trigger the requirement to provide affordable housing. There was some, although not overwhelming, support for using a floorspace threshold in the 2005 'Issues and Options' consultation stage (about 10% of respondents). At the 'Towards Preferred Options' stage there was very limited support

for the 500sqm threshold. As a result of these responses, and the need to be able to physically accommodate ten units to a satisfactory standard into a conversion, or via new build, the Council has raised the threshold to 800sqm. The provision of affordable housing is also subject to viability. The Council is of the view that rather than go ahead with the options on unit thresholds, a floorspace threshold is appropriate for the Borough and may mean that more schemes fall within the scope of the affordable housing policies.

- 4.187 In the July - September 2009 consultation for the Draft Core Strategy there were a number of objections to the affordable housing policies, notably from various developers. One of the main objections related to the floorspace trigger, with a number of respondents stating that units or habitable rooms should be used instead of floorspace. Several commentators objected to the floorspace threshold because they felt it was not justified in terms of viability, although the Kensington Society supports the floorspace threshold. Some house builders felt that seeking 50% affordable housing above 800sqm was too onerous and would stifle development. A number of developers felt that it would have an adverse effect on proposals which included between 10 and 25 units. The policy to limit the location of off-site affordable housing (to exclude wards with the highest concentration of social rented housing) was criticised by some organisations as being too restrictive.
- 4.188 The London Plan (Policy 3A.9) indicates that boroughs should take account of regional and local assessments of need, as well as the Mayor's strategic London-wide target that 70% of affordable housing should be social rented and 30% should be intermediate. The social rented/intermediate housing split has been modified from the London Plan figure to reflect local need as identified in the 2009 Strategic Housing Market Assessment. It is now proposed that 85% of affordable housing should be social rented and 15% intermediate housing. This policy is therefore in line with the London Plan and also paragraph 22 of PPS3. In addition, 54% of respondents to the 2005 consultation agreed that the proportions should be related to local need.
- 4.189 There was no comment on this policy in the Sustainability Appraisal of the Publication Core Strategy.

Gypsies and Travellers

- 4.190 The gypsy and traveller policy issue was not included at the 'Issues and Options' stage of the Core Strategy but has been included in subsequent consultation reports. However in the 'Interim Issues and Options' paper the issue was discussed but no options were raised, and there were no comments made. There were only two comments made at the 'Towards Preferred Options' stage, including one from the GLA regarding the need to address the additional pitch requirements flagged up in the London-wide study on gypsy and travellers. The

policy included in the Publication Core Strategy is consistent with the requirements set out in Circular 1/2006 and the London Plan. In the final Regulation 25 (July- September 2009) consultation the Government Office for London welcomed the inclusion of a criteria based policy on gypsy and travellers. A few minor changes to the text were proposed.

Other Issues

- 4.191 Options rejected include the issue about 'local needs housing' and restricting occupation of all new housing to local people or people with connections to the borough. This did not gain public support, would be difficult to implement, and may negatively impact on the housing market.
- 4.192 There was only one minor comment (internal) on hostels in the July 2009 consultation.
- 4.193 The diversity of housing policy is consistent with the 2008 Community Strategy which includes the aim to 'increase the type and number of homes to build mixed, balanced and sustainable communities.' The policy is in accordance with this objective.
- 4.194 PPS3: Housing requires Core Strategies to plan for a mix of housing on the basis of the different types of households that are likely to require housing over the plan period. The policy is consistent with this requirement.
- 4.195 The Sustainability Appraisal for the 'Towards Preferred Options' stage indicated that the housing mix policy generally performed well against the socially focused SA objectives, however a lack of detail meant it wasn't possible to ascertain any link between the policy and the environmental SA objectives. This policy performed well against the SA objectives on equalities. The policy was not identified as having a clear impact on the economic SA objectives. There was no comment on this policy in the Sustainability Appraisal of the Proposed Submission Core Strategy (July 2009).

Policy CH3: Residential Amenity (Now this has been moved to Renewing the Legacy chapter, although a policy on new amenity space is retained in the housing chapter. It is now within the housing mix section of Policy CH2)

- 4.196 Existing Amenity Space: One respondent suggested the policy should also cover extensions and conversions. This policy has now been moved to the 'Renewing the Legacy' chapter.
- 4.197 There was general public support for the provision of amenity space and for a flexible, rather than an overly prescriptive policy to take into account the different site circumstances. This was the case in both the

‘Towards Preferred Options’ consultation and the Publication Core Strategy consultation.

- 4.198 For this reason, the Council encourages provision of a range of different types of external amenity space, and stresses the importance of outdoor amenity space for family housing in particular. No options have therefore been rejected.
- 4.199 The Community Strategy includes a general goal to protect and improve the borough’s environment. It also includes specific objectives to enhance local biodiversity and preserve local habitats. The policy is in accordance with this objective.
- 4.200 PPS3 emphasises the particular need to provide recreational areas, including private gardens and play areas, where family housing is proposed. The policy is consistent with this requirement.

Policy CH4: Estate Renewal

- 4.201 The policy on estate renewal has evolved in response, in part, to public consultation comments but is also consistent with the principles set out in the London Plan (paragraph 3.75). In 2005, 36% of respondents thought there should be no net loss of affordable housing, 35% agreed with encouraging mixed and balanced communities by seeking a mix of tenures, and 21% supported increased densities to enable market housing to cross subsidise newly provided social rented units. In the final Regulation 25 (July- September 2009) consultation there were a limited number of comments on this issue. The GLA broadly support the policy. Kensington Housing Trust generally supported this policy and only proposed a few minor changes - for example, stating that housing needs should be assessed at the time of submission of the application.
- 4.202 The Community Strategy includes goals to improve the quality of housing across all tenures; increase the type and number of homes to build mixed communities; and improve the energy efficiency of dwellings and on this basis the policy is considered to further these aims.
- 4.203 PPS3 does not specifically refer to estates. The London Plan does not have a policy on estate renewal but paragraph 3.75 sets out the Mayor’s approach to estate renewal. For example it is stated that any estate renewal should result in existing housing being replaced by better quality accommodation, providing at least an equivalent floorspace. The policy is consistent with the London Plan approach.
- 4.204 The Sustainability Appraisal at the ‘Towards Preferred Options’ stage stated that this policy performed well. There was no comment on this policy in the Sustainability Appraisal of the Publication Core Strategy.

RESPECTING ENVIRONMENTAL LIMITS

Policy CE1: Climate Change

- 4.205 This policy sets out the Council's response to climate change. The policy requires development to meet various environmental performance standards (Code for Sustainable Homes or BREEAM), depending on the land use proposed and the scale of development. These standards consider issues such as the provision of energy from sustainable sources, flood risk, pollution, materials, waste and considerate constructors. The policy also requires development to adopt the energy hierarchy of energy efficiency, decentralised energy and renewable energy. The policy contains requirements for strategic sites to deliver, and other development to connect to, a district heat and energy network. The policy also requires the provision of sustainable food sources.
- 4.206 The Council's response to climate change appeared in the first Core Strategy 'Issues and Options' (Issues 49 and 50), November 2005, which put forward three options to improve environmental performance and sought views on the extent to which environmental sustainability could be accommodated having regard to the Borough's townscape quality. Respondents generally supported a policy which sought to significantly improve environmental performance. However, respondents did not support an option for 10% of energy requirements to be delivered from renewable sources, and this option was therefore not taken forward. Respondents considered that sustainable construction should be given priority in new buildings, but not for alterations to listed buildings and buildings in conservation areas; and leading edge contemporary design and high standards of energy efficiency should be considered for all types of development, which were taken forward.
- 4.207 These options were explored further in the 'Interim Issues and Options', February 2008, which questioned the extent to which the Council should require high environmental standards and questioned the impact of certain technology on townscape. Respondents considered that the Council should go beyond legal obligations, but acknowledged that it is unrealistic for the borough to become the most sustainable in London, given its architectural nature. Respondents generally supported the technology proposed in the side note, including the use of photovoltaics, CHP and the Code for Sustainable Homes within conservation areas, as long as the technology was well screened. However, wind turbines were not supported. The GLA raised concern that the Council's policy was too restrictive, focussing on the impact of technology on townscape which would be considered under conservation policies, and did not set ambitious environmental targets.

- 4.208 The indicative policy direction at the ‘Towards Preferred Options’ stage (July 2008) for the Borough to be at the cutting edge of environmental sustainability was well supported, although respondents required consideration of the impact of noise and greater use of the waterways. These policies have been taken forward, although the policy no longer refers to being at the ‘cutting edge’ as this was not supported by our Councillors who felt that a reasonable balance needed to be struck. Policies to meet ambitious Code for Sustainable Homes / BREEAM levels for different types of development, including subterranean development, with increasing targets in line with building regulations, were generally well supported. Although several respondents questioned the feasibility and viability for existing buildings in conservation areas. Policies for sites to accommodate district heating were also well supported. The GLA once again commented that this policy should not consider the impact on conservation areas, as this should be considered by heritage policies and conservation area statements. This policy was therefore subsequently dropped.
- 4.209 The indicative policies at the ‘Towards Preferred Options’ stage were generally taken forward to the final Draft Core Strategy consultation, (July- September 2009), with particular emphasis on achieving the Code for Sustainable Homes / BREEAM targets, requiring strategic sites to provide CCHP and requiring any provision of CCHP to be able to connect into a district heat and energy network in the future. This version also required development to contribute to meeting the Government’s national carbon dioxide reduction targets, acknowledging that these targets are national with a limited amount of reductions possible from such a densely developed inner city borough. Again, this policy was generally well supported, although there was concern from the GLA that the policy did not specifically require development to deliver the energy hierarchy of energy efficiency, decentralised energy and renewable energy. Concern was also raised regarding the viability and feasibility of delivering the CfSH / BREEAM targets for existing development.
- 4.210 The policies in the Publication Core Strategy (October 2009) took forward those in the Draft Core Strategy, providing more detail on the requirements for CCHP in strategic sites and other major development and requirements to connect to district heat and energy network. The GLA’s comments resulted in the inclusion of a policy requiring development to achieve the energy hierarchy of energy efficiency, decentralised energy and renewable energy. The CfSH / BREEAM targets for conversions and refurbishment have also been amended to ‘EcoHomes’ levels, following advice from consultants, to address concerns about feasibility. The Publication Core Strategy also introduced a policy requiring development to contribute to delivering an element of on site food production.
- 4.211 Aim 4 (Environment) of the Community Strategy seeks to promote energy efficiency, recycling and the reduction of pollution. Aim 5

(Environment) seeks to tackle the causes of and adapt to climate change.

- 4.212 The issue of Environmental sustainability is continually rising up the Government's agenda, especially since PPS1 was published in 2004. The Planning Act 2008 places a statutory duty on the Council to include policies designed to secure that the development and use of land contributes to the mitigation of, and adaptation to, climate change. The Government's response to climate change is detailed in the Supplement to PPS1 and the use of renewable energy is considered in PPS22. The Government has recently published national carbon dioxide emission reduction targets in the Climate Change Act 2008. London Plan Policies 4A.1 to 4A.10 set out the Major of London's current response to climate change.
- 4.213 Objective 5 of the Council's Sustainability Appraisal seeks to minimise effects on climate change through the reduction in emissions, energy efficiency and use of renewables and adopt measures to adapt to climate change. Energy efficiency is considered under Objective 14 of the SA.
- 4.214 Policy CL6 also helps to deliver the Aim 1 of the 'Environment and Transport' section of the Community Strategy 'To protect and improve the borough's environment by: (i) Protecting and enhancing the borough's residential and historic character, services and amenities, trees, parks and open spaces;'.

Policy CE 2: Flooding

- 4.215 The first reference to flooding within the Borough was made at the "Interim Issues and Options" stage of the Core Strategy. However, no strategic options were put forward at this stage, with the Core Strategy merely recognising that flooding has been a problem within the Borough. The responses received and the outcomes of the July 2007 flood event highlighted the importance of the Core Strategy tackling surface and sewer water flooding within the Borough. Therefore, the policies put forward aim to solve the problem through a precautionary approach, the use of SUDs and partnership working with other agencies such as Thames Water. Whilst the precautionary approach taken at the "Towards Preferred Options" stage was welcomed, some respondents wanted the policies to be strengthened and to be more specific for the type of flooding that the Borough faces. A policy to support the Thames Tideway Sewer Tunnel was included to take into account Thames Water's comments. The policy was also amended to include a stronger requirement for SUDs and the resistance of impermeable surfaces in front gardens.
- 4.216 The Community Strategy does not mention flooding directly. However it aims to tackle climate change and to take action to adapt to its effects.

- 4.217 The policies were strengthened in line with National Policy, PPS25 and the risk of flooding was also outlined in other parts of the Core Strategy including ‘Places’ and Strategic Sites.
- 4.218 Reducing the risk of flooding to current and future residents is one of the Sustainability Appraisal objectives. Therefore, future development will need to take into account location and the potential risk of flooding along with mitigation measures. The sustainability appraisal identified that the benefits to the environment of the strategic policy is unlikely to constrain the social or economic SA objectives. However, the strategic policy “Flooding” could have either a positive or negative impact on meeting the housing needs of the Royal Borough residents depending on its detail and/or the manner of their implementation. Therefore, care should be taken when implementing the policy.

Policy CE 3: Waste

- 4.219 The Borough’s approach to waste management is based on the need to minimise the impact that our community has on the environment through waste minimisation and recycling.
- 4.220 Options for the disposal of the Borough’s waste have changed since the “Issues and Options” stage where the construction and use of an incinerator was postulated, as was simply waiting for alternative waste disposal technologies that might develop in the future. Neither of these two options were considered to be realistic or feasible, with there being a presumption against development of incinerators in the London Plan. Therefore, there was a recognition that the Core Strategy still needed to tackle the disposal of the waste arisings in the Borough. The utilisation of mixed-use developments to provide waste management facilities (i.e. recycling facilities) and keeping the existing Safeguarded Cremorne Wharf for waste management purposes were the only options feasible. These options were kept in the final Draft of the Core Strategy.
- 4.221 As a result of the responses received we also included in our policies the provision of opportunities for the use of sustainable modes of transport to support the export of waste (including maximising Cremorne Wharf’s potential use for water transport) and the need for managing construction waste in a sustainable way.
- 4.222 Comments received highlight the need for the Council to clarify its position with regard how the Council intends to meet the waste apportionment to comply with the London Plan and PPS10. The Council will produce a separate waste Development Plan Document in the future. The future waste DPD will identify new sites which are suitable for waste management purposes; will set out which neighbouring boroughs the Council will be working to meet our

apportionment figures and how much the pooled apportionment of those boroughs would be. The Publication Core Strategy has also clarified how the Council will deal with applications for waste management facilities until such time as the Waste DPD has been formally adopted.

- 4.223 The Sustainable Community Strategy supports the reduction of waste and recycling.
- 4.224 The ISAR stated that options should include combined measures to ensure that waste is disposed of effectively and options should attempt to minimise the production of waste. Options of other forms of waste disposal and recycling should be put forward due to poor accessibility to some recycling and waste disposal facilities such as Cremorne Wharf. The final sustainability appraisal identified the benefits to the environment of this policy and the fact that they are unlikely to constrain the social or economic SA objectives.

Policy CE4: Biodiversity

- 4.225 This policy sets out the Borough's policy approach to protecting and enhancing/attracting biodiversity in the Borough. The policy refers to the Sites of Nature Conservation Importance which have been reviewed as part of the LDF process. This review is based on various ecological surveys, which find that although being small and densely developed, the Borough's biodiversity is remarkably rich.
- 4.226 The issue of nature conservation first appeared in the 'Interim Issues and Options' stage, February 2008. However, no strategic options were put forward, which raised significant concern. This resulted in the Council putting forward an indicative policy direction at the 'Towards Preferred Options' stage which committed the Council to explore how developments can best facilitate additional habitat creation through green roofs, green landscaping, discouraging hard standing and integrating green chains and the Blue Ribbon Network. This approach was generally well supported. The Draft Core Strategy took this forward by protecting Sites of Nature Conservation Importance or requiring significantly enhanced habitats. The Draft Core Strategy also made explicit the requirement for major development to submit an Ecological Impact Assessment as part of the planning application and set out the various methods which can be used to enhance biodiversity. This approach was supported, although one responded required specific mention of the biodiversity resource of the Blue Ribbon Network. This policy was taken forward in the Publication Core Strategy, making clear the link to the Biodiversity Action Plan, integrating the biodiversity of SNCI and the Blue Ribbon Network through Green Corridors, and removed the explicit requirements for measures to enhance biodiversity.

- 4.227 Aim 1 (Environment) of the Council's Community Strategy seeks to enhance local biodiversity and preserve local habitats.
- 4.228 Biodiversity is also considered in PPS 9: Biodiversity and Geological Conservation. London Plan Policy 4A.11 requires living roofs and walls. The Major of London's policies on the Blue Ribbon Network are set out in London Plan Policies 4C and policies on biodiversity and nature conservation are set out in policy 3D.14.
- 4.229 The Council's SA Objective 1 is to conserve and enhance the natural environment and biodiversity. The policy is therefore considered to support this objective.

Policy CE5: Air Quality

- 4.230 The entire Borough is designated as an Air Quality Management Area, owing to exceedences of nitrogen dioxide (NO₂) and fine particles (PM10). These pollutants are emitted from two main sources: the large number of vehicles passing through the borough each year; and as a result of the heating and cooling buildings. However, all development will generate some emissions to some degree or another, and therefore it is imperative that emissions are carefully controlled through planning policy.
- 4.231 Air Quality is first considered at the 'Interim Issues and Options' stage of the Core Strategy. This stage did not offer a strategic alternative to a policy which seeks to integrate land use and transport policy, (thereby reducing the need to travel by car), as this was considered by the Council to be a central tenet of sustainable development. This approach was generally supported, although respondents suggested that additional measures should be introduced to improve Air Quality. The 'Towards Preferred Options' stage therefore put forward an indicative policy direction to take imaginative measures in relation to transport, construction and land use to reduce the negative impact on air quality. Reducing the impact of transport on air quality was also considered within the chapter on 'Better Travel Choices'. Again, this policy was generally well supported although respondents considered imaginative approaches to be too vague. The Draft Core Strategy, therefore, proposed a policy which required new development not to make air quality worse and where possible to improve local air quality. This policy also raised concern with biomass combustion, stating that this contributes to increasing emissions. One respondent considered that all development will make air quality worse and this policy was therefore unreasonable. Other respondents also suggested the use of measures to encourage more sustainable travel, such as electric changing points and discounted parking for low polluting vehicles, which are considered under 'Better Travel Choices'. This resulted in the policy in the Publication Core Strategy which seeks to carefully control air quality emissions, minimising the impact on air quality and

reducing exceedences. This policy also seeks to control pollution by making the CfSH / BREEAM credits available for controlling pollution mandatory.

- 4.232 Aim 4 (Environment) of the Council's Community Strategy promotes the reduction of pollution by promoting the use of anti-pollution measures and reducing private vehicle journeys.
- 4.233 Air Quality is considered in detail in PPS23 and London Plan Policy 49.19.
- 4.234 Air Quality is considered in Sustainability Appraisal under Objective 7, which seeks to improve air quality in the borough.

Policy CE6: Noise and Vibration

- 4.235 The dominant sources of noise in the Borough are from road and rail traffic, construction (including DIY), neighbours, pubs/clubs, pavement cafés / outdoor seating and noisy building services plant and equipment. Vibration in the Borough, apart from temporary construction work, is usually caused by surface trains, including night freight trains and underground trains. The Council's noise standards are set out in the Noise SPD, adopted in May 2009.
- 4.236 This policy was introduced in the Draft Core Strategy, in response to the GLA's concerns that a policy controlling sources noise and development adjacent to existing noise was not included at the 'Towards Preferred Options' stage. The inclusion of this policy was generally well supported, although one respondee requested that greater reference be made to mitigating noise from plant equipment; and another requiring a policy which banned air conditioning. The GLA required reference to late night noise management and the protection of areas of tranquillity. Where possible, these comments have been addressed in the policy in the Publication Core Strategy. The Council does, however, note that it would not be appropriate to resist all air conditioning. The impact of air conditioning will, however, be minimised by considering all applications for air conditioning on their merits, having regard to the location of the equipment and noise. The Council is working with the GLA to designate Areas of Tranquillity and therefore proposes a policy which will anticipate these designations.
- 4.237 Aim 2 (Environment) of the Community Strategy seeks to deliver services and work with local people day by day to make the borough a pleasant place, by among other things (ii) protecting residents from noise and disturbance.
- 4.238 Consideration of noise is set out in Planning Policy Guidance Note 24 and the regional policy context is set out in London Plan Policy 4A.20.

4.239 RBKC's SA does not specify an Objective relating to noise. However, this may be considered under Objective 4 encouraging social inclusion, equity and the promotion of equality.