



ENGLISH HERITAGE

Mr Peter Lerner
Executive Director
Planning and Borough Development
Royal Borough of Kensington and Chelsea

Our ref:
Your ref:

Telephone:
Fax

BY E-MAIL: planningpolicy@rbkc.gov.uk

10 December 2009

Dear Mr Lerner

Royal Borough of Kensington & Chelsea – Local Development Framework: Proposed Submission Core Strategy with a particular focus on North Kensington

Thank you for the invitation to comment on the Royal Borough of Kensington and Chelsea's Proposed Submission Core Strategy. English Heritage is the government's advisor on all matters relating to the historic environment and a statutory consultee in respect of the Strategic Environmental Assessment (SEA) of plans. We are keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the Local Development Framework process.

English Heritage is broadly content with the treatment of the historic environment within the Proposed Submission Core Strategy and its Sustainability Appraisal.

It would be our preference to have the following archaeological priority area implications identified in the stated site allocations:

- Notting Barns Farm APA in the Wornington Green site allocation;
- Roman Road/settlement APA covering the Commonwealth Institute site;
- Roman Road APA partially within the Warwick Road site allocation; and
- Medieval hamlet and Jacobean mansion APA surrounding the Earl's Court site allocation.

Furthermore, we advise that there is archaeological potential, including the Notting Hill Roman Cemetery, indicated in the Greater London Sites and Monuments Record in respect of the North Kensington Sports Centre site. Desk based assessment of this is requested as part of any planning application.

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After some consideration, English Heritage has determined that it is satisfied with the Royal Borough's proposed approach to tall buildings. We have decided this on the basis of the:

- thorough baseline evidence on the topic, which includes a specific high buildings strategy and urban design strategy as recommended by our joint publication with CABE *Guidance on Tall Buildings* (July, 2007);
- contextual emphasis of the proposed high buildings element of Policy CL2; and
- proposed supplementary planning document (SPD) on building heights which is presently awaiting adoption.

We have been advised by the Royal Borough that this Building Heights SPD is not substantively different from the Draft Tall Buildings SPD which we supported. That document gave a clear indication as to the locations in the Royal Borough that were considered appropriate for tall buildings and those which were considered inappropriate. This also accords with our joint guidance with CABE. Consequently, we must note that we would be concerned if this has materially changed in the new Building Heights SPD as we think it is an important exposition on Policy CL2(h)-(m).

English Heritage wishes to note its interest in the historic environment elements of the Proposed Submission Core Strategy and to indicate our availability to participate in any discussions that might arise on this topic should our participation be deemed to be of use during the Examination process.

Finally, we must also note that this advice is based on the information provided by the Royal Borough and for the avoidance of doubt does not affect our obligation to advise the Royal Borough on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the documents, and which may, despite sustainability appraisal, have adverse effects on the environment.

Yours sincerely



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