

MATTERS 7/8: LOCATION OF DEVELOPMENT AND PUBLIC TRANSPORT ACCESSIBILITY

SUBMISSION FROM THE KENSINGTON SOCIETY

The Kensington Society **supports** the Council's policies:

- to resist new large-scale office development in higher-order town centres and locations that are highly accessible by public transport; and
- to resist the loss of large offices in such locations.

These policies are in accord with:

- national planning policy: PPG13 and PPS4;
- the London Plan;
- the Borough's UDP; and
- the Borough's Submission Core Strategy
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Policy on the location of large-scale office developments

In chronological order, national policy, the London Plan, the UDP and the Core Strategy all require large-scale office development to be:

- **in locations which are or will highly accessible by public transport, which should be shown as preferred locations** (PPG13 2001, paras 21, 27 and, in particular, 32)

PPG13 is explicit that development plans should identify preferred locations which are or will be highly accessible by public transport.

This was incorporated in **the Borough's UDP (2002)** which said that it should be:

- **in a town centre and/or within 400m of a high-capacity, high-frequency underground station (UDP 2002)**

The UDP set out:

- **a clear Borough strategy** (para 6xi) which as its primary objective seeks "to ensure that further large-scale office development is located in areas well served by public transport, where there is capacity for further growth";

- **specific preferred locations** (para 6.xiv) as being sites within 400m walking distance of six named “high capacity Underground stations and interchanges with high frequency bus services” – namely South Kensington, Earl’s Court, High Street Kensington, Notting Hill Gate, Gloucester Road, Knightsbridge and Sloane Square.
- **a strategic policy STRAT21** to encourage large-scale businesses to locate in those parts of the Royal Borough which are well served by public transport – which is repeated in para 6.2.1 (A) Objectives as “To restrain further large-scale business development by ensuring that such development is well served by public transport”
- **a “policy statement”** in para 6.3.3, which says “Large-scale business development will not be permitted where the site is not well served by public transport in terms of proximity to nodes of public transport and capacity of its network.” There is further justification in the paragraph.
- **Policy E1: Large-scale business development** : says

To resist large-scale business development unless .. the site is well served by public transport or would be as a result of the development providing or contributing to the improvement of public transport facilities”

PPS4: Planning for Sustainable Economic Growth (2009)

PPS4 went a step further in clarifying preferred locations as:

- **within a town centre or, if such sites are not available, within 500 metres of a public transport interchange (PPS4 2009)**

PPS4 (and PPG6 and PPS6 before) recognises offices as a town centre use (para 7) to which the sequential approach applies. However, it recognises that in addition to town centres, proximity to public transport interchanges defines suitable “edge-of-centre” locations as “within 500 metres of a public transport interchange .. for the purposes of the sequential approach” (Annex B – footnote 16 to definition of edge of centre)

The London Plan

The London Plan, which is part of the “development plan” for Kensington and Chelsea deals with this in the 2008 Plan and repeated in the Draft Replacement London Plan (2009) supporting high trip-generating development:

- **only at locations with both high levels of public transport accessibility and capacity, sufficient to meet the transport requirements of the development.(London Plan 2008, Policy 3C.1)**
- **only at locations with high levels of public transport accessibility (Draft Revised London Plan 2009, Policy 6.1)**

Policy 6.1, which deals with the London Plan's strategic approach to integrating transport and development, says:

"A. The Mayor will work with all relevant partners to encourage the closer integration of transport and development by:

- c. supporting development that generates high levels of trips only at locations with high levels of public transport accessibility, either currently or via committed, funded improvements."

The Core Strategy

The Submission Core Strategy Policy CF5 says that the Council will ensure that large and medium offices locate:

- **within town centres and areas of high public transport accessibility**

Policy CF5 says:

The Council will ensure that there is a range of business premises within the Borough to allow businesses to grow and thrive; to promote the consolidation of large and medium offices within town centres; support their location in areas of high public transport accessibility.."

What are high levels of public transport accessibility in the local context?

Large areas of this Borough have high levels of public transport accessibility (ie excellent or very good - PTAL5 or above), as opposed to "good" (PTAL 4), moderate (PTAL3), poor (PTAL 2) or very poor (PTAL1). See map on page 188 and the most recent TfL PTAL Map.

These extensive areas of high levels of public transport accessibility (PTAL 5 or above) are due to east-west underground lines (Central, District, Circle and Piccadilly Lines), which with interchange with buses or walking cover almost all of the area north of the King's Road to Kensington High Street and then up to Notting Hill.

This area is equivalent to the area covered by 400m circles around the key underground stations identified in the UDP or the 500m actual walking distance suggested in PPS4. See additional map.

The Council has chosen PTAL4 – good accessibility rather than “high” accessibility - as sufficient to focus large and medium-scale office development. The Society considers that this is too generous and should be raised to “High” (PTAL 5 or above).

The Society also considers that this encourages developers to disregard the sequential approach to identifying suitable locations.

Proposal:

Change:

Chapter 32: Better Travel Choices

Para 32.3.2: penultimate line – change “four” to “five”

Policy CT1 (a), line 4, change “4” to “5”

Map page 188: Classify PTAL 0-2 as Low
PTAL 3-4 as Moderate
PTAL 5-6 as High

Chapter 31: Fostering Vitality

CF5 (a) add “highly” before “accessible” in lines 6 and 9

(c) add “highly” before “accessible” in lines 4 and 7

(d) add “highly” before “accessible” in line 3

Para 31.3.33: Line 5: add “highly” before “accessible”

Para 31.3.34: Change “4” to “5” in line 3.

Para 31.3.35: Add: “highly” before “accessible” in last line.