

KENSINGTON SOCIETY: REMAINING ISSUES

The Kensington Society strongly supports and has a strong sense of ownership of much of what is in the Core Strategy.

The Examination in Public has been an effective airing of the remaining differences, but nevertheless there are still remaining outstanding issues.

The Council has produced a series of documents in response to issues raised at the EiP, including new papers, rolling changes, statements of common ground with other parties. This covering paper and separate responses to papers from the Council, especially RBKC/18F and RBKC/37, are the Society's response.

Key Issues

1. Quantum of Offices (18F)

The amount of net additional offices that are forecast by the Council to be needed by 2028 is a function of the number of new office jobs forecast, multiplied by the assumed amount of floorspace per worker/workstation, without assuming any improved productivity from the existing stock.

The Council prefers to use their consultant's assumption that new stock built over the next 20 years will not change in efficiency and that an appropriate assumption for the employment density for all future office developments is that the density will be 14.7sqm (net)/worker or 18sqm (gross)/worker. This compares with the GLA's assumption for the Draft Replacement London Plan, based on research by the London Office Property Review (2009), of 12sqm (net)/worker.

The Society asked the Council about their latest proposals to reconfigure their own office space in the Town Hall as an example of the direction that space planning was going. We have approached the Space Programme manager at the Town Hall for details of their latest programme that is about to be implemented. We asked for the amount of net floorspace/worker before and after change and, because they were also driving up the occupancy through hotdesking, the amount of space/workstation. (A copy of the email exchange is at Annex 1)

The existing employment density is 9.75sqm (net)/head or 8.54sqm (net)/workstation, whilst after the space programme it would be 6.09sqm(net)/head or 9.47sqm(net)/workstation. We accept that this level of efficiency may not be achieved in all new offices or refurbishments, but even taking the floorspace (net)/workstation of 9.5sqm(net) this suggests that a figure of 12sqm/employee as used in the London Plan is more likely than the Council's choice of 14.7sqm/employee.

As was illustrated in the EiP, this would not reduce the total office floorspace needed by much, but even this is conservative as no productivity improvements in the existing stock are allowed for.

The second issue was phasing. PPS4 suggests that the assessment of need be apportioned by 5-year plan periods. We consider that a split of pre and post 2017 is appropriate, especially since the Council sees the current commitments meeting the need to 2017 and the likely contributions at Kensal and Earl's Court meeting the need post 2017.

2. Crossrail station at Kensal and Counters Creek Sewer – uncertainty/risk and timing/phasing

These two major projects have a degree uncertainty/risk attached to them. The implications of these projects not proceeding or being delayed could have the effect of:

- reducing the scale or varying the mix of uses in the proposed development or delaying the project (Kensal Crossrail Station) or
- deferring the resolution of flood risk and requiring a more cautionary approach to development in areas at risk from surface water flooding (Counters Creek Sewer - see section on flood risk below)

The Society considers that the risk has not been sufficiently factored into the policies, especially the flood risk in the absence of the Counters Creek Sewer project receiving funding approval, and the need for rephrasing or scaling down if the Crossrail Station is not realised.

3. Walkable Neighbourhoods

The Keeping Life Local Chapter, which underpins the principle of walkable neighbourhoods, used some crude distances for preferred easy walking distances to key local amenities. The Society suggested that several of the key walking distances were too great given the density of population in the Borough, which would mean that smaller catchments would provide sufficient “customers” to support the facilities. The Society suggested that for monitoring purposes and for refining the policy smaller catchments would be needed in future. The Council's defence that they used distances preferred by “corporate partners”, since their choice of what is an acceptable distance may not match that of consumers. We consider that some of these distances, such as the distance of 800m for walking to a GP surgery, are too great and should be reviewed.

4. Post Offices

The Society is very concerned about the Council's unwillingness to acknowledge that post offices are a “social and community service”, largely on the ground that

it is currently an A1 Use Class use. We welcome the Council's move toward recognising the role of post offices, but do not consider that it will assist the Council in trying to stop the loss of further post offices, despite the cumulative effects of successive post office closures. We propose that post offices be classified as a social and community use and that the cumulative effect of the loss of post offices be acknowledged as a material planning consideration when considering development proposals which would result in the loss of a post office.

5. Location of high trip-generating uses/offices

The Society considers that there is confusion in the Council's approach to the location of high trip-generating uses such as large office developments. National policy, the London Plan and the UDP recognise the need for these developments to be in town centres or within 500m of a major public transport interchange or highly-accessible locations, defined for monitoring purposes in the London Plan as PTAL 5-6. (London Plan 2008, Performance measure 17, page 395).

The Council, having moved toward the idea of focusing such developments in town centres or areas with PTAL4 or above, adopted a policy CF5 (k) that large-scale office developments should be resisted in Employment Zones. The Society strongly supports that policy. At the EiP the Council introduced a new policy, not, as far as we could tell, based on an objection nor having been subject to consultation, to allow large-scale developments in Employment Zones as long as they consisted entirely of small and medium-sized units. We object as this would allow large-scale office developments, with no limit, in areas of low public transport accessibility (PTALs 2-3).

Having proposed relaxing the public transport accessibility for the location of large-scale office developments, the Council acceded to a proposal from Chelsfield not to resist the loss of an office development more than 160m from a town centre (based on a 2-minute walk to a sandwich shop at lunchtime!) The arbitrary choice of distance seemed to be tailor-made to deal with an office on a site on Holland Park Avenue in a PTAL6 area. This sends a contradictory message – new large offices in PTAL 2-3 areas are acceptable, but loss of offices in PTAL6 areas will not be resisted.

Proposals

The Society proposes:

- a. Large-scale offices should be limited to higher-order town centres and highly-accessible locations, which should be classified as PTAL 5 or above**

- b. **Employment Zones: large-scale and medium-sized office developments should be resisted**
- c. **Statement of Common Ground with Chelsfield should be rejected**
- d. **Policy CF5: this needs tightening up – the Society has proposed changes**
- 6. **Shopfronts:**

The Council did not agree to highlighting that the Council would be seeking a step-change in the quality of shopfront design – the policy would seek to drive up the quality. The Society proposes that a specific policy, rather than a general one about high quality design, should be on the face of the plan to provide the lead statement for the draft SPD on Shopfronts.

7. Views and Vistas:

The Society proposes that views and vistas in the UDP and those listed and shown in the new SPD on the Heights of Buildings should be shown in the Core Strategy.

8. Site Coverage

The Society is concerned that the degree to which sites are covered by development is not directly addressed in the plan. Both extensions to buildings above and under the ground cover the ground with an impermeable surface and increase the built density of a Borough which has the highest density in the country. Building over and under gardens is a key issue, but none of the policies address this issue. The Society proposes a limit to the site coverage by buildings.

9. Flood Risk

The Society is concerned that the plan does not show or have policies for areas that have a proven history of surface water or sewer flooding. The Environment Agency has produced a map showing areas at risk which the Council did not produce at the EiP, although it had been in their possession for the last year. The Society wants areas at risk from such flooding to be shown in the plan and for all of main policies in Policy CE2 to cover areas susceptible to surface water flooding. This should be incorporated in the adopted plan rather than wait for an “early review”. The Society proposes that the plan address this issue now – the policy should be adopted now. Without this risk being acknowledged and an appropriate policy included we consider the plan to be unsound.

Without a policy that will ensure that the risk from surface water is tackled, we consider that the plan is unsound. We proposed that the policies in Policy CE2

include areas at risk from surface water flooding, even if it takes the Council a few months to finalise the relevant map.

10. Diversity of Housing: Large Units

The Society considers that a strategy which seeks to ensure that 80% of new market housing units have 3 or more bedrooms which on experience of the last ten years does not meet the housing needs of Borough residents for a primary residence is unsound. To pursue a policy in the knowledge that the majority of these units will be sold on the international market and that most of these will not be primary residences, makes a nonsense of the Strategic Housing Market Assessment.

We consider that this policy is unsound as it is not targeted to meet the housing needs of Borough residents and the scale of “leakage” means that a large amount of the additional housing would not be meeting this need. The Draft Replacement London Plan (para 3.41) says: “there is little net requirement Londonwide for larger market homes. However, boroughs’ SHMAs may identify local variations in this broad pattern to be addressed in LDFs.” The Society recognises that the situation in this Borough may be different than the Londonwide situation, but to propose 80% of new market units being “large” is excessive.

The Society proposes that the proportion of market housing with 3 or more bedrooms be no more than 50%.

11. Monitoring

A number of the early indicators (eg housing targets) need to relate to completions, whereas those relating to location such as retail and offices, should relate to permissions, to provide an early warning of non-compliance.

SUPPORT

Height of buildings

The Society **strongly supports** this policy

Affordable Housing

The Society **strongly supports** the use of the 50% “target”

Annex 1: Space Programme Kensington Town Hall: Floorspace/worker

From: <Sue.Cooper@rbkc.gov.uk>
Date: Fri, 20 Aug 2010 15:00:08 +0100
To: Michael Bach michaelbach@madasafish.com
Subject: RE: Space Programme: Kensington Town Hall

Hi Michael,
The figures you requested are as follows:

Current	8.54 m2/workstation
Proposed	9.47 m2/workstation

Regards,

Sue Cooper - Head of FM

The Royal Borough of Kensington and Chelsea
The Town Hall, Hornton St, London W8 7NX
Phone: 0207 361 2110
Mob: 07717 801945

From: Michael Bach [<mailto:michaelbach@madasafish.com>]
Sent: 20 August 2010 10:14
To: Cooper, Sue: CP-GenServ
Subject: Re: Space Programme: Kensington Town Hall

Dear Sue,
Thank you very much for your speedy response. I hope it was not too much trouble. It is also quite useful to benchmark what you are achieving.

In order to check the figure on a common basis – because the degree of hotdesking may vary between schemes – what is the amount of net floorspace/workstation?

Michael

On 20/08/2010 09:00, "Sue.Cooper@rbkc.gov.uk" <Sue.Cooper@rbkc.gov.uk> wrote:
Dear Michael,

In Keith Harper's absence on holiday I have worked with members of his team to produce the information you requested in your email dated 17th August. The figures are as follows:

Current	9.75 m2/FTE
Proposed	6.09 m2/FTE

For clarification we used the net internal area of the 3rd, 2nd and the office half of the 1st floor (ie excluding the Civic area) and the current full time equivalent numbers of staff currently accommodated which is 814. The area will remain the same but will support 1304 FTE's after Space.

I hope this helps but if you have any queries please do not hesitate to contact me.

Regards,

Sue Cooper - Head of FM

The Royal Borough of Kensington and Chelsea
The Town Hall, Hornton St, London W8 7NX
Phone: 0207 361 2110

From: Michael Bach [<mailto:michaelbach@madasafish.com>]
Sent: 17 August 2010 12:31
To: keith.harper@rbkc.gov.uk
Cc: david.lewis@rbkc.gov.uk; Tim Ahern
Subject: Space Programme: Kensington Town Hall
Importance: High

Dear Mr Harper,

I am writing to you as I understand that you are managing the Space Programme which has led to the reflowing of the space in the Town Hall and the move toward hotdesking.

My interest is in the net floorspace per employee before and after the Space Programme has been implemented for the "office" element of the Town Hall (ie without all the civic functions, such as the Large and Small Hall building, the Mayoral suite and main committee rooms).

The reason I am asking is that there was a debate in the Examination in Public on the Borough's Core Strategy, which I attended as Chairman of the Planning Committee of the Kensington Society, about the net floorspace/employee for modern office buildings and modern space use standards. I asked for the Council's space standards before and after the Space Programme, but the Planning Department did not have this information.

Please could you let me have this information this week as I would like to use this evidence for the EIP.

If you have any queries, please contact me on 0207 937 3825.

Michael Bach
Chairman: Planning Committee
Kensington Society
3 Cambridge Place
London W8 5PB